

Purbeck Local Plan Review 2019

Matter A: Legal and Procedural Requirements

Further representations

Tuesday 2 July 10.00am

	Consultee ID	Name/Organisation
1	1191253	Catesby Estates Ltd
2	1188328	Wareham Town Council Neighbourhood Plan Steering Group
3	1188067	Welbeck Land
4	1191908	Dr Andrew Langley
5	1190024	Wyatt Homes (Upton & Lytchett Matravers)
6	1187112	Wool Flora & Fauna Group
7	1185234	Mrs Rachel Palmer
8	1192344	Trees for Dorset
9	1191015	Mrs Mandy Backhouse
10	1191476	Residents of Glebe Road
11	1190535	Ms Naomi Pickard
12	1188470	Moreton Parish Council
13	1190865	Dr Anthony Warne
14	1187806	Mr Andrew Wilson
15	1190735	West Lulworth Parish Council

EXAMINATION OF THE PURBECK LOCAL PLAN (2018-2034)

EXAMINATION STATEMENT ON BEHALF OF CATEBSY ESTATES PLC

Matter A – Legal Compliance and Procedural Requirements

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June 2019

EXAMINATION STATEMENT ON BEHALF OF CATESBY ESTATES PLC

Matter A – Legal Compliance and Procedural Requirements

05 June 2019

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EXAMINATION STATEMENT ON BEHALF OF CATESBY ESTATES PLC

Matter A – Legal Compliance and Procedural Requirements

05 June 2019

1.0 Introduction

- 1.1 This Examination Statement provides a response on behalf of Catesby Estates Plc ("Catesby"), to those Questions raised by the Inspector (dated 10 May 2019), relating to Legal Compliance and Procedural Requirements in respect of the Purbeck Local Plan (2018-2034) ("the Plan") and its supporting evidence base.
- 1.2 This Statement has been prepared by Neame Sutton on behalf of Catesby Estates Plc.

2.0 Matter A – Legal Compliance and Procedural Requirements

Issue 1: Duty to Co-operate

Question 3 – Does the Council's duty to Co-operate Compliance Statement [SD09] and the Statement of Common Ground (SoCG) [SD10a] demonstrate that the duty to co-operate has been met?

Question 4 – In relation to housing what are the implications of the matters identified by the Inspector in SD10a on whether or not the Council has met the duty to co-operate?

- 2.1 In Catesby's view the Council has not complied with the Duty to Co-Operate ("DTC").
- 2.2 As the Inspector will be aware the DTC is a legal requirement imposed upon the Council via Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended).
- 2.3 In particular S33A requires the Council to co-operate with every other local authority or county council or other prescribed body or person in maximising the effectiveness with which activities identified in subsection (3) are undertaken. In this context subsection (3) includes the preparation of a Development Plan Document, namely the Plan.
- 2.4 Subsection (2) also requires the Council to engage constructively, actively and on an ongoing basis.

- 2.5 For the reasons set out below specifically in relation to unmet housing need arising elsewhere within the HMA and in neighbouring authorities it is clear that the Council has failed the DTC. Furthermore the SoCG [SD10a] also indicates that the Council appears to have drawn a line in the sand at the point the document was signed in late 2018/early 2019 on the matter of continuing engagement with neighbouring authorities in the context of this Plan. That is in itself a failure to meet the statutory requirement of Section 33A(2).
- 2.6 As the Inspector has already identified the SoCG [SD10a] confirms in Table 4 that there is a likelihood of unmet housing need arising within the HMA. The Council's position appears to be that because the extent of the unmet need is unknown it cannot seek to address any as part of this Plan.
- 2.7 As we have identified in our Matter B Statement the extent of the unmet need particularly in relation to Christchurch is quantified and should therefore be address, at least in part, by this Plan. We have identified in our Matter B Statement that this Plan should reasonably be expected to accommodate $\frac{1}{4}$ of the unmet need arising from Christchurch.
- 2.8 This approach is reflective of the approach taken in respect of a recent Local Plan Examination in Waverley Borough in Surrey wherein the Inspector (Jonathan Bore) identifies an unmet need arising from one of three constituent authorities within the HMA and consequently assigned half of the unmet need arising to Waverley (being one of the two remaining authorities within the HMA).
- 2.9 The Council has not sought to address, or even test, the scenario where some unmet need arising from Christchurch is to be accommodated as part of this Plan. That is a direct failure of the DTC.
- 2.10 Furthermore the SoCG [SD10a] confirms that there is likely to be unmet need arising from the neighbouring New Forest National Park Authority. This unmet need is also quantifiable (see our Matter B Statement) and no regard has been given to it under the DTC by this Council.
- 2.11 The implications of the Council not addressing unmet need are twofold:
1. There is a direct quantifiable unmet need arising both within the HMA and from the neighbouring New Forest National Part Authority. As currently drafted the Plan does nothing to address or even consider this; and,

2. This represents a direct failure of the DTC, which is a matter of Legal Compliance that cannot be rectified after the event. In the event that the Inspector agrees with this point the Council would need to revert back to at least the Regulation 19 stage to properly address the DTC matter before proceeding back to Examination. If on the other hand the Inspector is of the view that the DTC has been complied with the matter of unmet need still needs to be addressed as part of the Matter B debate.

3.0 Changes Sought

3.1 The following changes are required for the Plan to be legally compliant:

1. Further effective and ongoing discussion is required with the constituent authorities within the HMA and with neighbouring authorities such as New Forest National Park Authority to address the matter of unmet need arising; and,
 2. If the Inspector reaches the view that the Council has failed the DTC then the Council will need to revert back to at least the Regulation 19 stage to address the unmet need issue. If on the other hand the Inspector reaches the view that DTC has been complied with then the unmet need issue must be addressed as part of the Matter B discussion.
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Examination of the Purbeck Local Plan

Further statements based on Inspector's Matters, Issues and Questions

Submitted by Wareham Neighbourhood Plan Steering Group (ID 1188328)

MATTER A: Legal and Procedural Requirements

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Issue 6: Other Legal and Procedural Requirements

Q2. The Local Plan indicates that all its policies are strategic. Is this justified and consistent with national policy?

1. The proposal that all the policies within the plan are strategic would cause a major problem for the Neighbourhood Plan process.
2. At the present time the glossary definition used in the Local Plan that “**Strategic policies:** Policies and site allocations which address strategic priorities” is unclear as the plan does not specify what is meant by ‘strategic priority’ nor does it list those policies or parts thereof that it considered to meet this definition. However this does not suggest that all the policies should be considered strategic.

3. The NPPF provides a definition of strategic policies, with para 20 stating clearly that

*Strategic policies should set out an **overall strategy for the pattern, scale and quality of development**, and make sufficient provision¹² for: a) housing (including affordable housing), employment, retail, leisure and other commercial development; b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); c) community facilities (such as health, education and cultural infrastructure); and d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

4. This talks about the overall strategy – and para 21 goes on to clarify that

*Strategic policies should **not extend to detailed matters** that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.*

5. In footnote 13 it similarly makes clear that “Where a single local plan is prepared the non-strategic policies should be clearly distinguished from the strategic policies.” It is therefore felt that the NPPF provides a clear steer that detailed matters that may reasonably be varied through Neighbourhood Plans should be non-strategic.
6. Table 1 highlights examples of very detailed matters contained in what would be considered strategic policies should all of the Local Plan policies be so defined:

Table 1. Detailed matters in Strategic Policies – examples

Policy	Detailed matters included	Consequential issues
Policy V2: Green belt	Green belt boundaries <u>have been amended</u> at Lytchett Matravers, Upton and Wareham to support sustainable development.	Prohibits any further amendments through Neighbourhood Plans due to overly restrictive wording and NPPG paragraph 136 – it would be better that the strategic policy simply identified the need for the strategic review of the Green Belt in these locations
Policy H8: Small sites next to existing settlements	Applications for small sites <u>will be permitted</u> where adjacent to existing homes in the closest town or village (as defined in the settlement hierarchy in the glossary of this plan), and not appear isolated in the countryside, provided the following apply...	Does not allow a Neighbourhood Plan to take a lead role in identifying such small sites through its process, given that this policy would still leave the door open to sites that are not then allocated through that plan. A more detailed response on this is given under Matter E, Issue 4.
Policy H9: Housing mix	For sites delivering 20 or more units, development proposals will be permitted where of the proposed market homes: a. <u>5% are offered for sale as self-build plots...</u> b. <u>10% are single storey homes.</u>	Does not allow a Neighbourhood Plan to take into account local evidence of housing need that may suggest a different mix is desirable in that particular locality
Policy H10: Part M of the Building Regulations	<u>10%</u> of the new homes proposed must meet the Building Regulation optional requirement M4(2): ‘Category 2 - accessible and adaptable homes’	As above - does not allow a Neighbourhood Plan to take into account local evidence of housing need that may suggest a different mix is desirable in that particular locality
Policy H11: Affordable housing	To reflect the latest evidence of housing need and national policy, the Council will seek to secure the following tenure mix.... Sites with 40% provision of affordable housing <u>10% social rented housing</u> <u>65% affordable rented housing</u> <u>25% affordable home ownership...</u>	Again this is very prescriptive and could prohibit a different mix that may be justified through the local evidence of housing need gathered as part of the preparation of a Neighbourhood Plan
Policy H12: Rural exceptions sites	In order to meet local community needs in rural areas, <u>except in the parishes of Swanage, Wareham and Upton</u> , affordable housing will be permitted in and around existing settlements	This would unnecessarily prohibit rural exception sites being promoted through the Wareham Neighbourhood Plan should such an opportunity or need arise in the future.
Policy EE3: Vibrant town and local centres	...proposals [for out of town retail] <u>over 200sqm (gross)</u> are supported by a retail impact assessment that establishes the development would not harm the vitality or viability of town and local centres.	Although supportive of the threshold, this would prohibit Neighbourhood Plans from identifying a different threshold should local evidence suggest this was necessary and appropriate
Policy I2: Improving	Proposals for development will be required to... provide for adequate parking levels <u>in</u>	This would unnecessarily prohibit the use of different parking standards that may be

Policy	Detailed matters included	Consequential issues
accessibility and transport [sic]	<u>line with the Bournemouth, Poole and Dorset Residential Car Parking Strategy, and non-residential parking guidelines</u>	justified in a Neighbourhood Plan area due to particular local circumstances and evidence that may be more up-to-date (the current parking standards are based on 2001 Census data)

7. We would therefore respectfully ask that, in order to be consistent with national policy, the details included in all the proposed policies are reviewed, and where there should be scope for variation through Neighbourhood Plans, are distinguished as separate non-strategic policies within the Local Plan

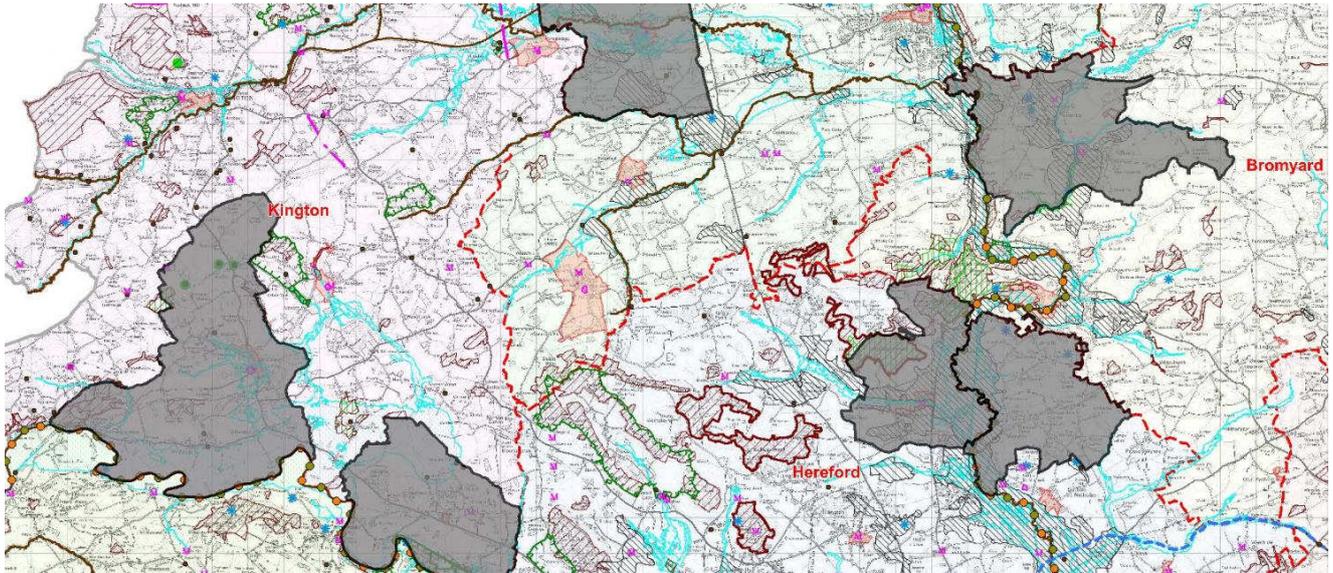
Q3. Does the Local Plan propose any policy that will supersede a policy in a made neighbourhood plan? If so, has this been clearly identified?

8. It is uncertain at this time whether the Wareham Neighbourhood Plan will be made before or after the Local Plan. It is currently at Examination and should the Examiner's report be issued in June, it could potentially be considered at the 30 July Cabinet meeting, and the referendum scheduled for early October, and the Plan then made at Full Council on 21 November. On the basis that the Local Plan Examiner's report will require further consultation on modifications it is considered likely that its adoption will be pushed back to early 2020. If this is the case, then the Local Plan policies will be superseded where they may be considered to be in conflict.
9. The submission version of the Wareham Neighbourhood Plan may be subject to modifications (most are) so at this stage it is not possible to say with certainty which policies would be in jeopardy of having a very limited life, and no clear list provided by the District Council in this respect, but there are certainly concerns with regard to the policies listed in Table 2:

Table 2. Potential Wareham Neighbourhood Plan conflicts

Policy	What the WNP policy covers	Potential clash with Purbeck Local Plan
Policy H1	Establishes locations for development and that no further greenfield sites should need to be released unless exceptional circumstances exist	Policy H8: Small sites next to existing settlements
Policy H2	Establishes the appropriate mix of houses with an emphasis on smaller dwelling types	Policy H9: Housing mix
Policy H11	This policy sets a minimum requirement of at least one dedicated parking space provided on plot or nearby within the site for any new residential development within the Conservation Area.	Policy I2: Improving accessibility and transport [sic]
Policy TC1	Defines the Town Centre boundary	EE3: Vibrant town and local centres – policies map
Policy TC2(c)	Resists three adjoining non-A Class uses undermining the character and diversity of that part of the Town Centre	EE3: Vibrant town and local centres
Policy TC3	Defines Carey Road Shops as a Local Centre	EE3: Vibrant town and local centres
Policy TC4	Includes impact on the Carey Road Shops as a consideration for out of town retail	EE3: Vibrant town and local centres
Policy GS1	Includes additional Local Green Spaces to that shown on the Local Plan policies map	Policy I4: Recreation, sport and open space – policies map

10. An approach such as taken by Herefordshire County Council, where they have blanked out areas in their core strategy referring to where neighbourhood plan policies apply, would be welcomed. A copy of their map¹ is reproduced below – the greyed areas are those covered by Neighbourhood Plans.



11. However, given the stage the Wareham Plan has reached it would be important to ensure the two are synchronised. Alternatively the Policies Map should be updated to reflect what is in the Wareham Neighbourhood Plan if made before the Local Plan is adopted. A different approach however would be needed on the exact Green Belt Boundary amendment given that this should be determined through the Neighbourhood Plan process.

¹ https://www.herefordshire.gov.uk/download/downloads/id/1799/core_strategy_policies_map.pdf

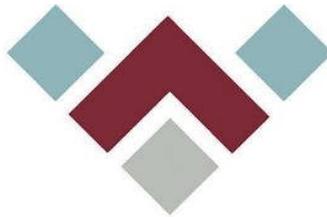
PURBECK LOCAL PLAN 2018 - 2034

EXAMINATION IN PUBLIC

RESPONSE TO MATTER A: LEGAL COMPLIANCE AND PROCEDURAL REQUIREMENTS

ON BEHALF OF WELBECK LAND

JUNE 2019



WELBECK LAND

Carter Jonas

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1.0 INTRODUCTION

- 1.1 This statement is submitted by Welbeck Land (“Welbeck”) in relation to the Examination in Public of the Purbeck Local Plan 2018 - 2034 (“the plan”). Carter Jonas LLP is instructed by Welbeck.
- 1.2 Welbeck is promoting the potential for the development of land at North Wareham and Sandford for residential and associated development acting on behalf of Charborough Estate.
- 1.3 Welbeck has been supportive of the preparation of the plan and the overall principle direction of key elements of the plan. Welbeck supports the overall strategy and the intention of providing a stable policy context for developers such as Welbeck Land to help provide the much needed housing in the District and in Wareham in particular.
- 1.4 Welbeck has specific and important concerns that the plan and its reliance on the Wareham Neighbourhood Plan will not deliver the required housing at Wareham. The evidence supplied by Purbeck District Council does indicate that there is a case for removing some land from the Green Belt, that which has few environmental constraints, in the North Wareham area which would provide for the expansion of the town, commensurate with Wareham’s size and importance to the District. This has not been addressed adequately through policies either within the Neighbourhood Plan or the Local Plan. Moreover, Welbeck is particularly concerned that the Purbeck Local Plan is attempting to contrive a position where this, with no adequate supporting evidence, would result in the loss of a viable and important employment land resource for Wareham and the District as a whole.
- 1.5 Representations were made detailing the views of Welbeck through the informal (Regulation 18) and publication (Regulation 19) consultations for the local plan (Representor ID: 1188067).
- 1.6 In this submission, Welbeck sets out its responses to Matter A: Legal Compliance and Procedural Requirements.
 - Issue 4: Sustainability Appraisal. Questions: 1,2 and 3
 - Issue 6: Other Legal and Procedural Requirements. Questions 1, 2 and 3.

This statement should be read in combination with the Welbeck responses to the inspector’s others Matters.

2.0 INSPECTOR'S MATTER A: LEGAL COMPLIANCE AND PROCEDURAL REQUIREMENTS

Issue 4: Sustainability Appraisal

Q1. Has the Plan been subject to an appropriate Sustainability Appraisal (SA) as required by section 19(5) of the 2004 Act having regard to the requirements of the European Directive on strategic environmental assessment and relevant national policy and guidance?

- 2.1 Welbeck has one query in regard to the Council's obligations to prepare a Sustainability Appraisal (SA) of reasonable options, to prepare a report on the consultations received and to demonstrate that the Council have taken into account the representations made, under the relevant regulations (Regulation 18 (Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012)). Welbeck has previously submitted representations which have raised important issues regarding the potential options for development in the area – the SA of those options – and the likely soundness of the Plan but no commentary has been published to indicate that our specific concerns have been taken into account.

Q2. Have the likely environmental, social and economic effects of the Plan been adequately assessed?

- 2.2 Welbeck considers that the range of 'SA Objectives' that was used to assess the effects of the plan were reasonable. These objectives included: social matters – housing & services/facilities; economic matters – employment & tourism; and environmental matters – flooding, biodiversity & natural and built environment. The cross over between matters was also picked up in commentary – i.e. where the natural environment has potential benefits to all three strands of sustainability.
- 2.3 Welbeck's concern arises not in the theory and methodology of the SA, and not in the way it was generally applied, but it is to the fact that there are significant gaps in the range of options considered; as detailed below. Therefore, Welbeck consider that the overall adequacy of the SA must be in doubt if the methodology has not been consistently applied to all the reasonable alternative.

Q3. Has the submitted Plan been tested against all reasonable alternatives where these exist, such as different options for the spatial strategy including the removal of land from the Green Belt and the distribution of development, particularly housing development?

- 2.4 The Sustainability Appraisal (SA) documents have been difficult to follow, and evolutions of the document have not always been available to review, and this despite cross reference between the volumes of the SA as it has been published. The Regulation 19 version of the SA did not include the potential of Wareham as a strategic location for growth. There is a statement on page 21 of that SA report as follows:

“Different options with regards to settlements and spatial strategy were explored as part of the SA of the New Homes for Purbeck Consultation of January 2018.”

- 2.5 However, this iteration of the SA was not available during the regulation 19 publication consultation. The result of that omission was to forestall any proper debate on the merits of this location in comparison with other identified sites for growth.

- 2.6 Review of sustainability appraisal documents that are now available as part of the examination reveals a reliance on site submissions to understand the ability of a location to accommodate growth. This is rather than a principle for growth in that location. For example, the April 2016 iteration of the SA includes the following settlement assessment:

Settlement: WAREHAM

Comprising the following site: • Land at Worgret Manor (SHLAA ref. 6/02/0170)

- 2.7 The opportunity for Wareham to be considered as a suitable location for strategic level growth appears to have been missed, and instead an assessment of a single available site has been taken to represent opportunities at the settlement. There are clearly other sites available – not least those promoted by Welbeck, but also others proposed for allocation by through the neighbourhood plan (NP) – but moreover, the strategic constraints for the settlement as a whole, the capacities of infrastructure and services and the *principle* for growth at Wareham is very difficult to find in the SA if it is there at all.

Issue 6: Other Legal and Procedural Requirements

Q1. The Purbeck Local Plan was submitted for examination on 28 January 2019. What are the implications, if any, for the Plan of the February 2019 revisions to the Framework and PPG resulting from the Government response to the Technical consultation on updates to national planning policy and guidance?

- 2.8 Welbeck sets out in response to the Inspector's Matter B that the revisions to the NPPF in both 2018 to introduce the standard methodology for housing need, and the confirmation in 2019 that the 2014 based mid-year projections should be used for their basis, suggest that a modestly increased minimum housing need requirement should be applied to the local plan.

Q2. The Local Plan indicates that all its policies are strategic. Is this justified and consistent with national policy?

- 2.9 Welbeck considers that the policies contained in the Local Plan can all be understood as strategic, and because there are 'strategies' for Wool, Lytchett Matravers and Upton there should equally be a strategy for Wareham. Furthermore, the strategic need for the SANG in Wareham also requires a policy in the Local Plan similar to I5: Morden Park SANG.

- 2.10 The NPPF paragraph relevant to these matters is 21, which states:

"Plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any nonstrategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies."

- 2.11 The majority of policies in the Local Plan can be applied in the same way in any location across the plan area. The need for new homes and jobs; the importance of natural and heritage assets; the provision of services and facilities; and, planning obligations will be applicable to any planning application relative to its size. Further detail about

the design, access and amenity of proposals is not strategic and therefore can be covered by other local or neighbourhood policies.

- 2.12 The ‘strategies’ for certain locations, however, point to the importance of those locations to the overall Local Plan strategy. Each location that has its own strategy is specifically mentioned in Policy V1 as a location for growth and an element in the plan’s housing land supply. It follows therefore, that if Moreton Station / Redbridge Pit, Wool, Lytchett Matravers and Upton warrant a strategic policy then the same should be said for Wareham and Bere Regis.
- 2.13 Welbeck submits that it is reasonable to have strategic policies to identify the broad priorities for each of the ‘important locations’ of policy V1. These can, and should, be developed with the local community, but as is required by paragraph 65 of the NPPF, the Local Plan is the higher order document in the Development Plan and should provide direction for neighbourhood plans to amplify and add detail. The importance of the locations to the overall strategy also means that the delivery of development allocations is critical. Those allocations need to be demonstrably deliverable, and their delivery needs to be closely monitored and contingencies should be planned as necessary.
- 2.14 A strategic policy for Wareham should be included in the plan and three site allocations should also be included that will demonstrate the overall deliverability of Wareham’s element of the plan target (10% of the 2,688 total):

Proposed Policy H7A – North Wareham: Land North of Carey Road

Land as shown on the policies map will help to meet the District’s housing needs by providing up to 60 new homes on Land to the North of Carey Road. Along with the requirements relating to all development on the sites allocated for new homes in this plan, housing development will be expected to:

- a. *Ensure that the site is accessible to all traffic from the Carey Road and from Westminster Road.*
- b. *Provide a suitable SANG commensurate with the scale of this allocation near or adjacent to the land.*

Provided that if an applicant considers there are site specific considerations that mean they are unable to provide any of the above, the Council expects applicants to submit a financial viability appraisal with their planning application. The applicant will be expected to fund the independent verification of the submitted viability assessment by a person appointed by the Council.

Proposed Policy H7B – North Wareham: Land North of Bere Road

Land as shown on the policies map will help to meet the District’s housing needs by providing up to 95 new homes on Land to the north of Bere Road. Along with the requirements relating to all development on the sites allocated for new homes in this plan, housing development will be expected to:

- a. *Ensure that the site is accessible to all traffic from Bere Road.*

- b. *Provide a suitable SANG commensurate with the scale of this allocation near or adjacent to the land.*
- c. *Ensure no direct pedestrian access link to the public footpath leading to Wareham Forest.*
- d. *Provide a suitable alternative allotment facility within reasonable walking distance.*

Provided that if an applicant considers there are site specific considerations that mean they are unable to provide any of the above, the Council expects applicants to submit a financial viability appraisal with their planning application. The applicant will be expected to fund the independent verification of the submitted viability assessment by a person appointed by the Council.

Proposed Policy H7C – Sandford: Land to the South of Sandford

Land as shown on the policies map will help to meet the District's housing needs by providing up to 40 new homes on Land to the South of Sandford. Along with the requirements relating to all development on the sites allocated for new homes in this plan, housing development will be expected to:

- a. *Provide a suitable SANG, if required commensurate with the scale of this allocation, near or adjacent to the land.*
- b. *Provide a replacement public playing field facility.*

Provided that if an applicant considers there are site specific considerations that mean they are unable to provide any of the above, the Council expects applicants to submit a financial viability appraisal with their planning application. The applicant will be expected to fund the independent verification of the submitted viability assessment by a person appointed by the Council.

Q3. Does the Local Plan propose any policy that will supersede a policy in a made neighbourhood plan? If so, has this been clearly identified?

- 2.15 This was an area of acute concern to Welbeck when it appeared that the Wareham Neighbourhood Plan (NP) was well in advance of the Local Plan. Welbeck was concerned that at a stroke, the Local Plan would render a recently made NP out-of-date.
- 2.16 The contrivance whereby the Local Plan releases land from the Green Belt and the Wareham NP proposed policy H4 (Land to the North of Carey Road) would have required immediate review of the NP. Furthermore, the submitted Wareham NP – which has provision for around 180 new homes – would then be required to revisit that provision, and to consider 300 dwellings (regardless of the windfall allowance), because this would be a material change in circumstance.
- 2.17 Moreover, the submitted Wareham NP is being tested for its conformity with the extant Purbeck Local Plan and as such should pause its progress until matters with the Local Plan have become clearer, or it has been adopted.

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Part I Matter A. Legal Compliance and Procedural Requirements

1 Issue 5. Habitats Regulations

1.1 Qs 1 to 3

1.1.1 Appropriate Assessment of the Local Plan

1.1.1.1 The Conservation of Habitats and Species Regulations 2017, Regulation 63(1) requires an appropriate assessment of the implications of a plan for a protected site in view of that site's conservation objectives. That is, the assessment is focussed on the integrity of a single site with all of the effects (in-combination with other plans and projects) upon it, and any mitigation¹. By contrast, the Purbeck local plan HRA is a single-plan, policy-by-policy appraisal of existing mitigation policies on a collection of protected sites. So, for any given site it is not obvious which LSEs apply, whether in-combination effects are present, what is their adverse effect on the site's integrity, and how any mitigation is expected to work. The HRA does not fulfil the accepted interpretation of Regulation 63(1). The HRA assesses the pre-submission version of the Local Plan, but referenced conclusions relating to previous versions do not automatically carry forward, particularly since in-combination effects may have changed in the meantime.

1.1.1.2 Are there any plan-level issues associated with Habitats Regulations 42 and 43(1)(d) relating to protected animal species?

1.1.2 Definition and State of Proposed Mitigation

1.1.2.1 The baseline conditions for assessing the effectiveness of mitigation on the Dorset Heathlands are not clearly established in the HRA's appropriate assessment or the Dorset Heathlands Planning Framework SPD. "Dorset Heathlands" covers many fragmented areas with differing characteristics, so *global* criteria such as "no net increase in urban pressures" may not be appropriate metrics of harm. The proposed mitigation is experimental and may not succeed, so it is important that the baseline conditions and methods of monitoring them are clear. A large amount of data has already been collected and analysed, and there is an on-going programme of monitoring, but it is not obvious how they validate that mitigation is working and whether the evidence supports continuing the strategy (see also HRA paras. 4.14-4.19). There is no contingency in the mitigation plan for failure of the SAMM/SANG approach, and SANGs are likely to be ineffective for some heath users (such as horse riders and cyclists).

¹European Commission. Assessment of plans and projects significantly affecting Natura 2000 sites. Nov 2001. ISBN 92-828-1818-7

1.1.2.2 The Nitrogen Reduction in Poole Harbour SPD was adopted in April 2017, but as yet there is no Implementation & Monitoring Plan for it, so the delivery of mitigation is hard to compare with a plan that meets the requirements of appropriate assessment. However, councils are taking steps to control nitrogen as development progresses and to build a “buffer” of nitrogen reduction in advance. There is a clear target of no net increase in nitrogen discharges that reach Poole Harbour from new development.

1.1.2.3 The Poole Harbour Recreation SPD is still unfinished (post-consultation), but the consultation draft did not identify the proposed mitigation other than in general terms. The appropriate assessment should have identified what mitigation is required and why it will work. An Implementation and Monitoring Plan is missing.

1.1.2.4 It is hard to see how the adverse effects of “small sites” (policy **H8**) will be properly mitigated by current policies. A single site of 933 houses would *require* a significant SANG or HIP as mitigation. Many effects of 933 distributed houses (on protected sites) will be comparable with one or more larger developments of the same total size. Their effects on the Dorset Heaths could not be mitigated by access management alone any more than could a single site’s effects. SANGs are likely to be effective only when they associate more closely with a development than the asset that is being protected (in this case the heaths) so it is unlikely that the planned SANGs of the large allocations would also be effective for a diffuse collection of small sites.

1.1.2.5 The possible modification **MM22** is not consistent with the strategy for mitigation of larger sites. Taken to a logical conclusion, if all the proposed development were on “small sites” then apparently only monitoring for potential, cumulative adverse effects would be necessary, whereas very strong evidence exists for specific mitigation such as SANGs for sites with more than 50 houses (the threshold in the Dorset Heathlands SPD) (HRA para. 8.3 confirms). A project-level appropriate assessment for any small site would have to take into account the in-combination effects of the entire Local Plan (as well as other plans & projects) so the conclusion that mitigation is required is inevitable unless the site is more than 5km from the heaths. Given the geographic uncertainty of the small sites, a more consistent strategy would be to provide SANGs for 933 houses close to existing settlements with the intention of drawing their residents away from the heaths rather than the residents of the small sites themselves. This would require MMs to Local Plan paras. 255 to 257, Policy **I5** and **MM20** to implement. It would still be necessary to assess small sites for all other adverse effects, including cumulative effects from clustering.

1.1.2.6 Mitigation for effects of recreation on Poole Harbour SPA are missing in policies **H6** & **H7** (their developments lie within the relevant zone identified in the emerging Poole Harbour Recreation SPD). This is also overlooked in the HRA (and in relation to developments at N Wareham).

1.1.3 Erratum

1.1.3.1 I withdraw my representations on policies **E7**, **E8** & **E9**. The current wording is correct.

**Purbeck Local Plan Examination
Hearing Statement on behalf of Wyatt Homes
(Respondent: 1190024)**

Matter A – Legal and Procedural Requirements

June 2019



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Client

Wyatt Homes

Our reference

WYAW3012, WYAW3013 and WYAW3014

June 2019

1. Introduction

- 1.1 This statement is submitted on behalf of Wyatt Homes (Respondent ref: 1190024) to the Purbeck Local Plan Examination. It responds to the Issues and Questions outlined under '*Matter A – Procedural and Legal Requirements*'.
- 1.2 This statement follows our representations submitted in December 2018 in response to the consultation held on the Purbeck Local Plan 2018 - 2034 Pre-Submission Draft (Ref SD01a). It should be noted that separate representations were made on behalf of Wyatt Homes in relation to a number of sites within what was then Purbeck District. The full list of representations and appendices submitted in December 2018 on behalf of respondent 1190024 is as follows:
- Representations in relation to Land East of Wareham Road, Lytchett Matravers:
 - Appendix 1: Delivery Framework Document for Land East of Wareham Road
 - Representations in relation to Blaneys Corner and Sunnyside Farm, Lytchett Matravers:
 - Appendix 1: Delivery Framework Document for Blaneys Corner and Sunnyside Farm
 - Appendix 2: Blaneys Corner – Landscape and Green Belt Study by HDA
 - Appendix 3: Sunnyside Farm – Landscape and Green Belt Study by HDA
 - Representations in relation to Land at Policemans Lane and Frenches Farm, Upton:
 - Appendix 1: Delivery Framework Document for Land at Policemans Lane
 - Appendix 2: SHLAA Consultation Response in relation to Frenches Farm, Upton
- 1.3 This statement is prepared in support of all of the above representations. However, we have not considered it necessary to address every Issue or question set by the Inspector. Therefore, the responses provided in Section 2 of this Statement cover only those areas where Wyatt Homes consider a response is required to support or elaborate on their original representations.

2. Response to Issues and Questions – Matter A

Issue 1: Duty to Co-operate

Question 4 - In relation to housing, the Purbeck Local Plan states that it is seeking to meet the housing need for the area it covers in full. The SoCG [SD10a] indicates that at present the extent to which other areas in Dorset can meet their own needs is not fully understood, as the work on assessing potential development options in each area is at different stages. It indicates that there is a strong possibility that Bournemouth and Christchurch will be unable to meet their needs (Table 4 page 11) and that should this prove to be the case the local planning authorities are committed to work together to assess the potential for some or all of this need to be met within other authorities' areas and that this work will need to be informed by an appraisal of all reasonable options for the distribution of growth across Dorset, taking account of issues such as land availability, infrastructure capacity and development constraints.

The SoCG [SD10a] also indicates that in relation to local authority areas adjoining Dorset the principal issue of unmet housing need is likely to arise from New Forest District.

What are the implications of the above when considering whether or not the Council has met the duty to co-operate?

- 2.1 Whilst the final version of the Statement of Common Ground (SoCG) was published in March 2019, this is ostensibly the same document as that the draft version published in October 2018 (SD10), other than the fact that SD10a was signed by all of the Dorset local authorities.
- 2.2 We commented on the text of the SoCG within our representations in December 2018 and expressed concern that no significant work had been undertaken to explore how the unmet housing need, being identified as arising principally from Bournemouth and Christchurch, would be met by other parts of Dorset.
- 2.3 It is clear from reviewing SD10a that nothing further has been done to address this issue and that the March 2019 SoCG essentially adopts a 'wait and see' approach. The SoCG, continues to refer to a belief that the Government will undertake changes to the methodology for calculating local housing need and explains that until that change is made, the precise level of housing need across Dorset cannot be calculated.¹ This position is surprising given that the latest version of the NPPF was published on 19th February 2019 and that accompanying Planning Practice Guidance, setting out a clear methodology for calculating local housing need was published on 20th February 2019, the month prior to the final signing and publication of the SoCG.
- 2.4 We acknowledge that the process of signing the SoCG was a lengthy one, with the first signature being applied, by Purbeck District Council, on 9th October 2018 and the final signature (the Borough of Poole) not being applied until some six months later on 12th March 2019. However, we remain of the view that the time taken in agreeing the SoCG does not provide a justified excuse for the lack of response to updated national planning policy and guidance.

¹ See for example, paragraphs 16 and 17 of SD10a.

- 2.5 As the SoCG explains, the combination of increasing housing need across Dorset, particularly within the Eastern Dorset Housing Market Area (HMA), and falling rates of housing delivery over recent years indicate *“the need for a ‘step change’ in housing delivery rates if the housing needs from resulting from the new standard methodology are to be met”*.² An approach of continued inaction will only serve to exacerbate what is clearly understood to be a challenging issue across the county.
- 2.6 In addition to awaiting a future change in the Government’s methodology for calculating local housing need, which as referred to above was addressed in Planning Guidance on 20th February 2019, the SoCG states that it is not possible to understand the extent to which each part of Dorset can meet its own needs as work on addressing potential development options in each area is at different stages.³ However, the situation has now markedly changed with the recent local government reorganisation. There are now only two local authorities covered by the SoCG and work on the local plans for the previous district and borough local authority areas (with the exception of Purbeck) appears to be stopping in favour of the preparation of local plans for the new unitary authorities which need to be in place by 2024.
- 2.7 Due to the local government reorganisation, the preparation and adoption of the Purbeck Local Plan remains the last likely opportunity to begin to address the unmet housing needs across Dorset ahead of the lead-in to the adoption of the unitary area local plans. We therefore consider that this opportunity should not be lost and that Dorset Council should take the lead by seeking to make at least a contribution towards meeting the unmet housing needs within the Eastern Dorset HMA through increased planned housing delivery within the Purbeck area.
- 2.8 As the work to confirm the level of unmet housing needs and to agree how these will be distributed has not been undertaken, it is accepted that a more ‘broad-brush’ approach would need to be taken in order to ensure that the latest national planning policy and planning guidance could be complied with. This could involve, for example, a modest uplift to Purbeck’s local housing need figure of say around 10 per cent. This would allow for a meaningful contribution to be made to addressing the unmet housing needs over the plan period, but without undermining the overall spatial strategy for Purbeck set out within the local plan or necessitating any significant delay in the progress and adoption of the local plan.
- 2.9 Whilst we acknowledge that some parts of the Purbeck area are constrained, there are clear opportunities for additional housing sites to be included within the local plan⁴ or, in some cases, for proposed sites to be extended to increase their overall capacity. For example, Wyatt Homes has for some years promoted a larger housing site at Blaneys Corner, Lytchett Matravers. This site, extended to adjacent land controlled by Wyatt Homes, would be capable of delivering 60 dwellings over the early years of the local plan, rather than the 25 proposed by the Council.⁵

² Paragraph 18, SD10a

³ Paragraph 22, SD10a

⁴ See also the answer to Question 4 in our statement covering Matter B – Housing Needs and Requirements.

⁵ For further details see our previous representations made in relation to Land at Blaneys Corner and Sunnyside Farm, Lytchett Matravers, including the accompanying ‘Delivery Framework Document’ for these adjacent sites.

- 2.10 Overall, our view remains that, in relation to the legal requirements of the Duty to Co-operate,⁶ the Council has demonstrated that compliance has been achieved. However, in terms of the ‘soundness’ of the local plan, as determined by the ability to meet the tests at paragraph 35 of the NPPF, we remain of the view that there has been a delay in the Dorset authorities seeking to reach agreement on the likely level and the proposed distribution of the unmet housing needs arising within the Eastern Dorset HMA in particular. Therefore, in order to ensure the Purbeck Local Plan is both **positively prepared** and **effective**, unilateral action should be taken by Dorset Council to propose such Main Modifications as are required to demonstrate that the local plan can make a meaningful contribution towards meeting the likely unmet needs arising from the Eastern Dorset HMA.

Issue 6: Other Legal and Procedural Requirements

Question 6 (a) Having regard to the provisions of the Local Government (Structural Changes) (Transitional Arrangements) (No.2) Regulations 2008, when is the wider plan for the new unitary authority, within which the area covered by the Purbeck Local Plan falls, intended to be brought forward?

Question 6 (b) What, if any, are the implications of this for the examination of the Purbeck Local Plan and should the Purbeck Local Plan explain this?

- 2.11 We leave it to the Council to advise on part (a) of Question 6. In relation to part (b), we consider that it is essential that the Purbeck Local Plan proceeds through Examination and that it can be adopted by the Council. A significant level of work has been put into the preparation of the local plan by Officers, Members and by the promoters of proposed allocation sites and this work must not be wasted due to the timing of local government reorganisation in Dorset.
- 2.12 Subject to any alternative timetable that the Council adopts, the Dorset plan for the new unitary authority may not be adopted for five years. This timescale is not unreasonable for the preparation of a single plan for an area of the scale and complexity of Dorset, but it will result in an undesirable planning vacuum for some years until the new plan emerges. This vacuum will clearly work against the overall objectives of national planning policy to bring about a boost in housing delivery and economic growth. Therefore, and in light of the priority that the Dorset SoCG correctly gives to achieving a ‘step change’ in housing delivery, it is essential that the Purbeck Local Plan is allowed to progress to adoption by Dorset Council.
- 2.13 As we have argued above, it is also important for the local plan to be **effective**. There is a clear opportunity for a meaningful contribution to be made now by the Purbeck Local Plan. Indeed, in the Dorset context, this is likely to be the last opportunity to address this issue for several years to come.
- 2.14 Finally, we consider that the Purbeck Local Plan should explain that, in the event that the new plan for the wider Dorset area comes forward and is adopted before one or more site allocations included within the Purbeck Local Plan are built out, these unimplemented site allocations should be ‘saved’ by the new plan, subject to

⁶ As set out within the Localism Act 2011 (as amended).

appropriate confirmation from site promoters that the sites remain available and deliverable.

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Southampton
SO14 0TB

T 023 8072 4888

Please Consider all representations from Rachel Palmer that are Environmental as from **Wool Flora and Fauna** and Trees for Dorset. This is to avoid unnecessary repetition for the inspector

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- Question 7 – Council’s commitment to protection of Biodiversity loss?

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- Tree surveys?
- Damage to Lichens
- Omission of maps of Nightjar in Parish
- Dorset’s Biodiversity management statements unsatisfactory

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- Continued from page 10
- Priority Habitats

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- Specifies definitions

Photos

- 1 Wildlife records from residents Page 3
- 2 Matter E housing (b) rural ambience and character of Wool
- 3 Unsuitability of SANG Page 6

Reference to Inspectors Questions

MATTER A

Issue 3

Question 2 No

a) Opportunities for access to the relevant part of the plan regarding environment were denied. Having been refused permission by the landowner / developer to carry out verification on certain species and an insect survey Wool Flora and Fauna requested viewing of the EAD Ecological report. The senior officer was approached but she said it could not be viewed – had gone missing. This report is presumably still unavailable as it is not on the list of Supporting Documents.

b) The first consultation in 2015 resulted in P.D.C. presenting a Histogram misrepresenting the response to the effect that Housing in Wool was the most favoured response including people from Wool. The reverse was true and the Chief Executive wrote an apology for this inaccuracy but pointed out it could not be removed from the files.

c) Questions raised by the packed hall to the meeting of officers, councillors and the public were not answered. We were promised replies if we submitted these questions in writing. No answers were delivered. Tuesday 9th October 2017.

d) The consultation Have Your Say in which options A,B and C were put forward for selection only in a small way asked if none of the options were acceptable. Most people I have talked to were unaware that this would count as a vote against the houses and therefore opted for A, 470 being the smallest number. I advised having phoned they could do this but most had already returned their response as A. The results of this consultation were therefore skewed in favour of 470 houses in Wool. January / March 2018.

e) The electronic survey – the last chance for people to have their say was difficult to access to register even for those who were reasonably computer competent. Only after protest did Purbeck volunteer a help session in Wool for one afternoon and evening where many able to express their views. Many people did not respond as they felt belittled as computer skills failures and some could not be available on this occasion.

Question 3

f) Wool has been regarded as a black hole environmentally despite actually being a BIODIVERSITY HOTSPOT and perhaps the finest example of a HABIT MOSAIC in Dorset – if not England – see previous evidence. There has been a stone walling regarding this:-

- i) Wool was excluded from Wild Purbeck consultations and findings despite representation. I was told by a P.D.C. officer that Wool was not to be included – on Species Records? Habitats (including Priority Habitats?) 13 Ancient Woodlands – Ancient Woodland being one of the top most BIODIVERSE Habitats but no reasons were given.

- ii) Wool Flora and Fauna formed from 7 qualified Environmental Experts mostly living in the village was formed to help break through the ignorance and a booklet “The Natural Environment of Wool” was produced and sent to Purbeck District Council. It was never acknowledged nor the direction to our website.
- iii) The wildlife exhibition we put on in February 2018 was ignored by Councillors despite being at the D’Urbeville Building next door to an exhibition by Savilles on the New Version of Wool’s development. Councillors were invited to drop in and see our Environmental exhibition next door, no one did.
- iv) A letter to P.D.C Councillors reminding them of the U.N.’s declaration 2011-2020 Decade of Biodiversity and reminding them of Purbeck’s own BIODIVERSITY Statement was ignored, no response, not even a thank you.
- v) In response to L.P.P.F. requirements P.D.C. set up an interview between Natural England a Steve Tapscott and Dr Warner was invited to attend. Mr Tapscott had to give back word and his place was taken by a Senior Planning Policy Officer (previously in charge of housing). This officer could contribute nothing on the environment indeed had openly stated previously Wool was ideal for development as it had so much open space – this is in denial of Wool’s 18% figure for density of the Built Environment – way higher than any other village in Purbeck. It will be in the region of 22% if this development goes ahead. There seemed total ignorance of Wool’s extensive wildlife designated areas and the importance emphasized by the N.P.P.F. of networks – corridors needed to support them. Dr Warner wasted to understand his input was irrelevant and invalid. He felt the meeting totally unsatisfactory.
- vi) Baroness Maddock whom we wrote to for support and from whom we were given advice to lobby our Councillors – unanimous deaf ears and contact out local MP who said he could not get involved. This inquiry is our last chance to be heard.

Issue 4 - Sustainability

Appraisal

Question 1. No It does not achieve sustainable development as it fails on C the third essential listed in the N.P.P.F. – the Environment, see my submission on Housing regarding the SANG for Wool which is not SUSTAINABLE regarding Tenure or Management.

Question 2 No. The likely environmental , social and economic effects have not been adequately assessed .

- i) There is little or no protection of Wool’s amazing Biodiversity.
- ii) There will be lost amenity for present and future generations as a scenic rural area is changed into a townscape. Those who choose to live in Wool because of the Natural Environment could be forced to move and be replaced by residents with more urban aspirations and demands for further infrastructure e.g. entertainment. At present children obviously enjoy the ambience and the thrill of discovering and seeing plants and animals viz a viz those who attend Wool on the Wildside club. They have clocked up 170 species in 8 Acre

Coppice over the past year and a half and Trees for Dorset who run their My Life My Tree Growing Together project in Wool, all 6 rural schools love the Survey of a local Bluebell Wood. The registration of Wildlife sightings run in Parish by Wool Flora and Fauna has been followed with enthusiasm. Has exciting record again this year a Broad Bordered Humming bird, Hawkmoth. Many householders enjoy the pleasure of Hedgehogs in their gardens and feed them. The plan if adopted will result inevitably in more road casualties.

Question 3 Bere Regis has been overlooked because of the developer driven offer of sites in Wool. It has various advantages over Wool. Added to my points about the quality of the A35 Dorchester, Bere Regis road and the spacious school in large grounds whereas migration in Wool will probably require a new school.

- i) No snarl up of traffic equal to Wool's railway crossing.
- ii) A small business area in the village with possibilities of expansion.
- iii) Brown field site of the former primary school.
- iv) Fewer environmental constraints – no Habitat Mosaic
- v) Nearer to routes to Towns to the north and motorways, no problem of negotiating the C6 first.
- vi) Sewage is listed as a constraint – but not in Wool where it is perhaps more of a problem with proximity to SSSI making expansion difficult.

How thoroughly has Bere Regis been thought out as an alternative to Wool?

To the Inspector

I feel most of these comments are relevant to submissions by Wool Flora and Fauna, Trees for Dorset and my own submission re Wool I therefore, with the exception of my comments on Bere Regis, to avoid repetition ask them to be considered as part of the above 3 responses.

I follow this email with some added brief comments on Habitats Regulation issue 5, Issue 6 other Legal Procedural Requirements and Housing Need Matter B. I hope these will be accepted although I will not be able to speak on any as I shall be on my annual holiday in the first week on the enquiry but will have some matters to voice under Matter E and Matter F. These comments will follow.

Mon legality was recorded on my response for myself and Wool Flora and Fauna group.

(Consultees 1191476,1191015,1190535)

This statement is made on behalf of the 61 residents of Glebe Road in Lytchett Matravers who strongly oppose this proposed development of 95 houses on Green Belt Land.

Matter A

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Issue 4: Sustainability Appraisal.

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Issue 5: Habitat Regulations

Issue 6: Other Legal and Procedural Requirements

Appendices

Issue 4: Sustainability Appraisal

Q1. Has the Plan been subject to an appropriate Sustainability Appraisal (SA) as required by section 19(5) of the 2004 Act having regard to the requirements of the European Directive on strategic environmental assessment and relevant national policy and guidance?

Having looked at the sustainability appraisal of Policy H6 we have to question its veracity. Firstly it scores positively in relation to “Harness the economic potential of tourism and widen employment opportunities” where in fact no employment is proposed and the village has very limited employment opportunities (see our response under Issue 6). Secondly it scores as significantly positive in relation to reducing the need to travel by car and encourage cycling, walking and use of public transport, and as a consequence positively in terms of the final criterion on minimising pollution and the consumption of natural resources. Yet land to the far south of the village (east of Wareham Road) is simply not well served by public transport and the main facilities that are in the village are outside the preferred maximum walking distance (again please see out more detailed response under Issue 6). This also applies to the second criterion. The indirect impacts on the heathlands and Poole Harbour are not acknowledged under the sixth criterion. The assessment does not reflect the differences between the site options within Lytchett Matravers.

A further concern we have is that there is no clear explanation why Option C (was to focus development at just Wool and Redbridge Pit/Moreton Station, with no development at Lytchett Matravers) which scored better in terms of its sustainability scores was rejected and Option A incorporated into Policy V1.

Q3. Has the submitted Plan been tested against all reasonable alternatives where these exist, such as different options for the spatial strategy including the removal of land from the Green Belt and the distribution of development, particularly housing development?

In the light of the local housing market area (which according to SHMA 2015, spans Bournemouth; Christchurch; East Dorset; North Dorset; Poole; and Purbeck) and taking into account the new unitary authority, Dorset Council

(which was established in 1st April 2019 but its formation agreed long before the Purbeck Local Plan was submitted for its examination), the Local Plan has not been tested against all reasonable alternative sites for housing as it has only considered sites within the now defunct Purbeck area.

Different options for housing development, without removing land from Green Belt, need to be explored in this new amalgamation of several other councils in order to satisfy NPPF.

Para 136 states that “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”

Para 137 continues “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.”

The decision to remove land from Green Belt is a serious and irrevocable one and therefore should not be rushed until all other options are given due consideration. This surely must include other sites within the new Dorset Council area.

The former Purbeck District Council may have been keen to avoid delays to the plan, but they have been aware of this change and how it would impact on their plan-making programme since before February 2018 when the Secretary of State’s final decision was announced by way of a written ministerial statement (the draft Order was then laid before Parliament in April 2018).

Furthermore there is no immediate need for housing on this scale in Lytchett Matravers. According to PDC’s evidence, there are at least 97 houses in construction currently or which have been approved and are likely to commence in the next 5 years. Between 2001 and 2014 the Dorset County monitoring showed that the village grew by on average 9 dwellings per annum – so 97 houses is equivalent to 10 year’s supply. The impact of this infilling is already being felt in our village, with increased pressure on our services and roads.

Table of existing housing land supply. See Appendix 1

Graph of completions based on Dorset County Council monitoring data (as previously published). See Appendix 2

Issue 5: Habitat Regulations

Q1. Is the Plan legally compliant with respect to the Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitats Regulations)? The conclusion of the Habitat Regulation Assessment states the need for effective mitigation of the effects of developments.

The indicative location shown for the SANG on the Inset Map is on land to the north-east side of Lytchett Matravers. This is not in an accessible location for the occupants of the proposed 95 houses on the land east of Wareham Road, as it is positioned one and a half miles away from the site; so it is difficult to see how this site would mitigate the effects of this development, particularly given that the nearest heathlands that the SANG is intended to divert pressure from are located to the south (and not to the north).

Issue 6: Other Legal and Procedural Requirements

Q4. Is the Local Plan in compliance with Section 19(1A) of the Planning and Compulsory Purchase Act 2004 which requires development plan documents (taken as a whole) to include policies designed to secure the development and use of land in a local planning authority's area to contribute to the mitigation of, and adaptation to, climate change?

One of the main contributors from development to climate change is CO₂ emissions generated by vehicle trips. It is therefore important that development is planned in locations where there is good access to facilities and employment by sustainable modes of transport and not generating frequent trips by car. The following is an extract from the latest (March 2019) government-published national statistics.

[2018 UK Greenhouse Gas Emissions, Provisional Figures – Statistical Release](#)

Transport sector

In 2018, carbon dioxide emissions from the transport sector were 121.4 Mt, 2.6 per cent (3.2 Mt) lower than in 2017, and 3.2 per cent lower than in 1990. In 2018 transport accounted for a third (33 per cent) of all carbon dioxide emissions. The large majority of emissions from transport are from road transport.

The NPPF is clear that even in releasing Green Belt land the focus should be on those areas which are well-served by public transport (para 138). Policy H6's proposal for up to 95 new homes on Land to the East of Wareham Road is simply in an unsustainable location in terms of climate change.

There are virtually no employment opportunities in Lytchett Matravers which is a rural village.

Although it has a reasonable range of local facilities, these are lower in comparison to other settlements in Purbeck (as acknowledged in the previously adopted Local Plan). This is thought to be due to its proximity and relationship with the larger Poole-Bournemouth conurbation, a fact that will not change in the future.

The poor self-containment of the area is clear from the 2011 Census returns, with over 72% of the active workforce travelling more than 5km to work.

See Appendix 3 Census returns

Existing public transport services, whilst offering some limited utility, would not allow for a trip by public transport to employment opportunities in the Bournemouth / Poole conurbation (without having working flexible hours that allow an early return as the last bus back departs at 5:35pm, and the earliest bus on a Saturday departs at 9:30am) or to leisure opportunities on weekday evenings. There is no train and only one bus service running.

See Appendix 4: Poole – Lytchett Matravers Bus Timetable

Furthermore the site is too far from the village centre to walk, so inhabitants of these 95 houses would even be prone to drive to and from the village increasing traffic and pollution. An 800m distance is referred to in the Institute of Highways and Transportation (IHT) Guidelines "Providing for Journeys on Foot". Table 2 of the IHT Guidelines indicates suggested acceptable walking distances for pedestrians of:

See Appendix 5: Table 2 of IHT guidelines

With the exception of the school (which is about 630m on foot from the centre of the site), all of the local facilities exceed the acceptable distance for journeys on foot, and most also exceed the 1.2km preferred maximum (which doesn't even take you as far as the High Street / Huntick Road junction).

One of the aims of the Lytchett Matravers Neighbourhood Plan is 'to maintain the quiet surrounding roads with minimal increase in heavy traffic' and 'to encourage residents to walk to the centre' of the village. Such a large development as has been proposed does not reflect these principles that have already been adopted in our Neighbourhood Plan.

Appendices: Matter A

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Appendix 1 Table of existing housing land supply.

Appendix 2 Graph of completions based on Dorset County Council monitoring data (as previously published)

Appendix 3 The poor self-containment of the area – 2011 Census returns

Appendix 4: Poole Lytchett Matravers Bus timetable

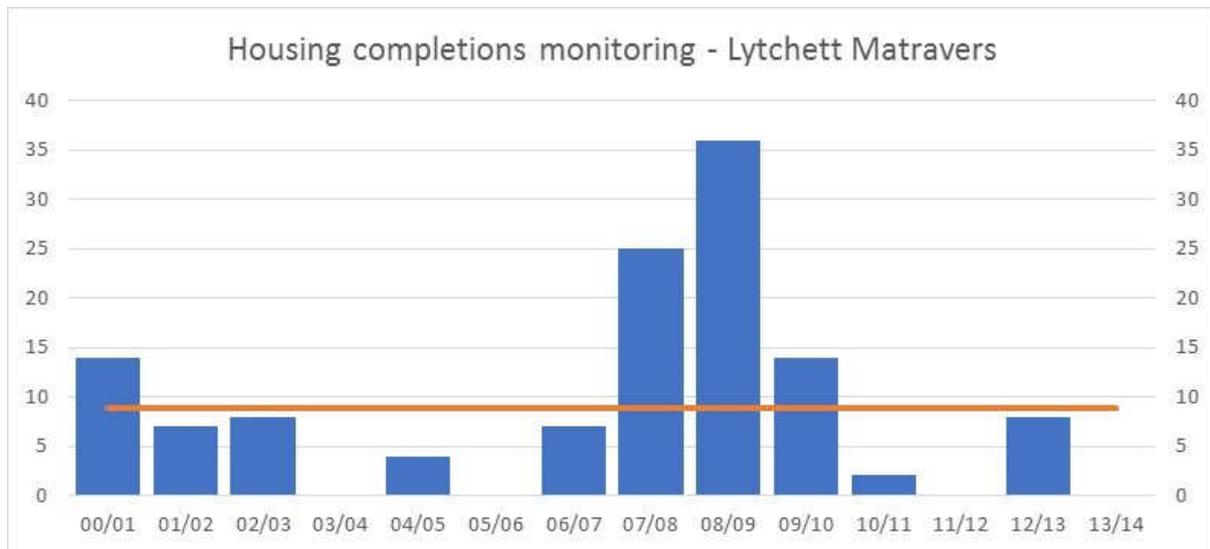
Appendix 5: Table 2 of IHT Guidelines

Appendix 1: Table of existing housing land supply.

Address	Ref	Permission	Status	Net
Bennic Farm Dolmans Hill Lytchett Matravers BH16 6HP	6/2018/0216	Full	not started	1
Three Jays, Deans Drove, Lytchett Matravers, Poole, BH16 6EQ	6/2018/0433	Full	under construction	2
86 Wareham Road, Lytchett Matravers BH16 6DT	6/2018/0362	Full	under construction	4
3 Hopmans Close, Lytchett Matravers, Poole, BH16 6AY	6/2018/0374	Full	not started	1
Land adjacent to Wessex Water Reservoir, Purbeck Road, Lytchett Matravers	6/2018/0287	Full	not started	25
Former Royal British Legion Club, Lytchett Matravers, BH16 6HQ	6/2018/0645	Full	not started	7
The Walled Garden, Colehill Road, Lytchett Matravers, BH16 6BS	6/2018/0081	Full	under construction	1
Higher Loop Farmhouse, Loop Farm Road, Lytchett Matravers, BH16 6BU	6/2017/0169	Full	under construction	1
169 Wareham Road, Lytchett Matravers, Poole, BH16 6EA	6/2017/0206	Full	under construction	1
16 Foxhills Crescent, Lytchett Matravers BH16 6BE	6/2017/0511	Full	under construction	1
Redbridge Farm, Dolmans Hill, Lytchett Matravers BH16 6HP	PDA/2016/0002	Permitted development	not started	1
19 & 20 Huntick Estate, Lytchett Matravers	6/2012/0734	Full	under construction	3
Annaberg, Middle Road, Lytchett Matravers	6/2013/0594	Full	under construction	1

Northhouse Farm, Huntick Road, Lytchett Matravers, BH16 6BB	6/2018/0696	Reserved matters	not started	2
Land at Huntick Road, Lytchett Matravers	6/2018/0063	Full	not started	46
TOTAL				97

Appendix 2: Graph of completions based on Dorset County Council monitoring data (as previously published)



Appendix 3: The poor self-containment of the area – 2011 Census returns

QS702EW - Distance travelled to work	Lytchett Matravers	
Work mainly at or from home	221	15%
Less than 2km	67	5%
2km to less than 5km	117	8%
5km to less than 10km	570	38%
10km to less than 20km	327	22%
20km to less than 30km	86	6%
30km to less than 40km	14	1%
40km to less than 60km	26	2%
60km and over	58	4%

Appendix 4: Poole Lytchett Matravers Bus timetable

10 Poole - Lytchett Matravers more Bus

Timetable valid from 25/05/2019 until further notice.
 Direction of stops: where shown (eg: W-bound) this is the compass direction towards which the bus is pointing when it stops

Mondays to Fridays											Saturdays							
Service Restrictions	SH	Sch	SH	Sch	SH	Sch												
Poole, Bus Station (Stand L)	0835	1005	1105	1205	1305	1405	1450	1505	1625	1735	0835	1005	1105	1205	1305	1405	1505	
Sterte, Sterte Post Office (N-bound)	0840	1010	1110	1210	1310	1410	1455	1510	1630	1740	0840	1010	1110	1210	1310	1410	1510	
Stanley Green, opp Palmer Road	0842	1012	1112	1212	1312	1412	1457	1512	1632	1742	0842	1012	1112	1212	1312	1412	1512	
Stanley Green, Wessex Gate (W-bound)	0845	1015	1115	1215	1315	1415	1500	1515	1635	1745	0845	1015	1115	1215	1315	1415	1515	
Upton, Upton Crossroads (N-bound)	0852	1022	1122	1222	1322	1422	1507	1522	1645	1752	0852	1022	1122	1222	1322	1422	1522	
Organford, Organford Manor (W-bound)	0855s	1025s	1125s	1225s	1325s	1425s	1510s	1525s	1648s	1755s	0855s	1025s	1125s	1225s	1325s	1425s	1525s	
Slepe, Newton Farm (N-bound)	0859s	1029s	1129s	1229s	1329s	1429s	1514s	1529s	1652s	1759s	0859s	1029s	1129s	1229s	1329s	1429s	1529s	
Lytchett Matravers, Giebe Road (NE-bound)	0901s	1031s	1131s	1231s	1331s	1431s	1516s	1531s	1654s	1801s	0901s	1031s	1131s	1231s	1331s	1431s	1531s	
Lytchett Matravers, Sports Pavilion (W-bound)	0903s	1033s	1133s	1233s	1333s	1433s	1518s	1533s	1657s	1803s	0903s	1033s	1133s	1233s	1333s	1433s	1533s	
Lytchett Matravers, Meadow Rise (E-bound)	0904s	1034s	1134s	1234s	1334s	1434s	1520	1534s	1658s	1804s	0904s	1034s	1134s	1234s	1334s	1434s	1534s	
Upton, Beacon Hill Caravan Park (SE-bound)	0910	1040	1140	1240	1340	1440	—	1540	1704	1810	0910	1040	1140	1240	1340	1440	1540	

Saturdays	
Poole, Bus Station (Stand L)	1625 1735
Sterte, Sterte Post Office (N-bound)	1630 1740
Stanley Green, opp Palmer Road	1632 1742
Stanley Green, Wessex Gate (W-bound)	1635 1745
Upton, Upton Crossroads (N-bound)	1642 1752
Organford, Organford Manor (W-bound)	1645s 1755s
Slepe, Newton Farm (N-bound)	1649s 1759s
Lytchett Matravers, Giebe Road (NE-bound)	1651s 1801s
Lytchett Matravers, Sports Pavilion (W-bound)	1653s 1803s
Lytchett Matravers, Meadow Rise (E-bound)	1654s 1804s
Upton, Beacon Hill Caravan Park (SE-bound)	1700 1810

Sundays		Bank Holidays	
no service		no service	

Service Restrictions: SH - Dorset School Holidays
 Sch - Dorset School Days
 Notes: s - demand stop

10 Lytchett Matravers - Poole more Bus

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 Direction of stops: where shown (eg: W-bound) this is the compass direction towards which the bus is pointing when it stops

Mondays to Fridays											Saturdays						
Service Restrictions	SH	Sch	SH	Sch													
Organford, Organford Manor (W-bound)	—	0855	—	1025	1125	1225	1325	1425	1525	1648	1755	0855	1025	1125	1225	1325	1425
Slepe, Newton Farm (N-bound)	0721	0859	0959	1029	1129	1229	1329	1429	1529	1652	1759	0859	1029	1129	1229	1329	1429
Lytchett Matravers, Giebe Road (NE-bound)	0723	0901	0901	1031	1131	1231	1331	1431	1531	1654	1801	0901	1031	1131	1231	1331	1431
Lytchett Matravers, Sports Pavilion (W-bound)	0726	0903	0903	1033	1133	1233	1333	1433	1533	1657	1803	0903	1033	1133	1233	1333	1433
Upton, Upton Crossroads (E-bound)	0736	0912	0912	1042	1142	1242	1342	1442	1542	1707	1812	0912	1042	1142	1242	1342	1442
Stanley Green, Wessex Gate (E-bound)	0743	0919	0919	1049	1149	1249	1349	1449	1549	1714	1819	0919	1049	1149	1249	1349	1449
Stanley Green, Palmer Road (S-bound)	0746	0922	0922	1052	1152	1252	1352	1452	1552	1717	1822	0922	1052	1152	1252	1352	1452
Sterte, Sterte Garage (S-bound)	0748	0924	0924	1054	1154	1254	1354	1454	1554	1719	1824	0924	1054	1154	1254	1354	1454
Poole, Bus Station (Stand L)	0755	0930	0930	1100	1200	1300	1400	1500	1600	1725	1830	0930	1100	1200	1300	1400	1500

Saturdays	
Organford, Organford Manor (W-bound)	1525 1645 1755
Slepe, Newton Farm (N-bound)	1529 1649 1759
Lytchett Matravers, Giebe Road (NE-bound)	1531 1651 1801
Lytchett Matravers, Sports Pavilion (W-bound)	1533 1653 1803
Upton, Upton Crossroads (E-bound)	1542 1702 1812
Stanley Green, Wessex Gate (E-bound)	1549 1709 1819
Stanley Green, Palmer Road (S-bound)	1552 1712 1822
Sterte, Sterte Garage (S-bound)	1554 1714 1824
Poole, Bus Station (Stand L)	1600 1720 1830

Sundays		Bank Holidays	
no service		no service	

Service Restrictions: SH - Dorset School Holidays
 Sch - Dorset School Days

Appendix 5: Table 2 of IHT Guidelines

	Within Town Centres	For Community / Schools	Elsewhere
Desirable	200m	500m	400m
Acceptable	400m	1000m	800m
Preferred Maximum	800m	2000m	1200m

(Consultees **1191476**,1191015,1190535)

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Matter A

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One of the main contributors from development to climate change is CO₂ emissions generated by vehicle trips. It is therefore important that development is planned in locations where there is good access to facilities and employment by sustainable modes of transport and not generating frequent trips by car. The following is an extract from the latest (March 2019) government-published national statistics.

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Transport sector

In 2018, carbon dioxide emissions from the transport sector were 121.4 Mt, 2.6 per cent (3.2 Mt) lower than in 2017, and 3.2 per cent lower than in 1990. In 2018 transport accounted for a third (33 per cent) of all carbon dioxide emissions. The large majority of emissions from transport are from road transport.

The NPPF is clear that even in releasing Green Belt land the focus should be on those areas which are well-served by public transport (para 138). Policy H6's proposal for up to 95 new homes on Land to the East of Wareham Road is simply in an unsustainable location in terms of climate change.

There are virtually no employment opportunities in Lytchett Matravers which is a rural village.

Although it has a reasonable range of local facilities, these are lower in comparison to other settlements in Purbeck (as acknowledged in the previously adopted Local Plan). This is thought to be due to its proximity and relationship with the larger Poole-Bournemouth conurbation, a fact that will not change in the future.

The poor self-containment of the area is clear from the 2011 Census returns, with over 72% of the active workforce travelling more than 5km to work.

See Appendix 3 Census returns

Existing public transport services, whilst offering some limited utility, would not allow for a trip by public transport to employment opportunities in the Bournemouth / Poole conurbation (without having working flexible hours that allow an early return as the last bus back departs at 5:35pm, and the earliest bus on a Saturday departs at 9:30am) or to leisure opportunities on weekday evenings. There is no train and only one bus service running.

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Furthermore the site is too far from the village centre to walk, so inhabitants of these 95 houses would even be prone to drive to and from the village increasing traffic and pollution. An 800m distance is referred to in the Institute of Highways and Transportation (IHT) Guidelines "Providing for Journeys on Foot". Table 2 of the IHT Guidelines indicates suggested acceptable walking distances for pedestrians of:

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With the exception of the school (which is about 630m on foot from the centre of the site), all of the local facilities exceed the acceptable distance for journeys on foot, and most also exceed the 1.2km preferred maximum (which doesn't even take you as far as the High Street / Huntick Road junction).

One of the aims of the Lytchett Matravers Neighbourhood Plan is 'to maintain the quiet surrounding roads with minimal increase in heavy traffic' and 'to encourage residents to walk to the centre' of the village. Such a large development as has been proposed does not reflect these principles that have already been adopted in our Neighbourhood Plan.

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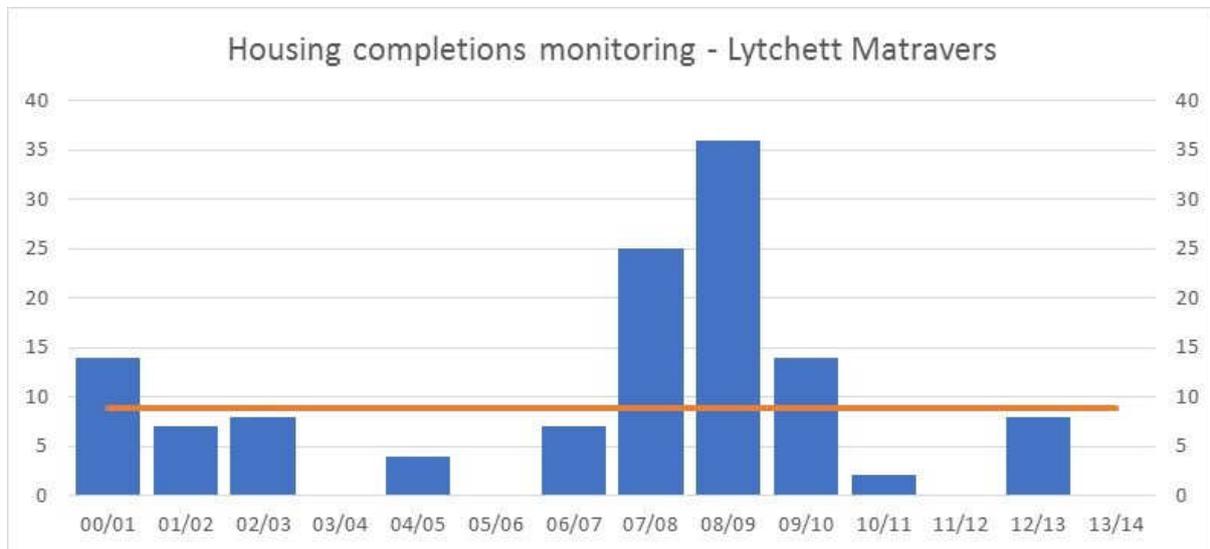
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3 Hopmans Close, Lytchett Matravers, Poole, BH16 6AY	6/2018/0374	Full	not started	1
Land adjacent to Wessex Water Reservoir, Purbeck Road, Lytchett Matravers	6/2018/0287	Full	not started	25
Former Royal British Legion Club, Lytchett Matravers, BH16 6HQ	6/2018/0645	Full	not started	7
The Walled Garden, Colehill Road, Lytchett Matravers, BH16 6BS	6/2018/0081	Full	under construction	1
Higher Loop Farmhouse, Loop Farm Road, Lytchett Matravers, BH16 6BU	6/2017/0169	Full	under construction	1
169 Wareham Road, Lytchett Matravers, Poole, BH16 6EA	6/2017/0206	Full	under construction	1
16 Foxhills Crescent, Lytchett Matravers BH16 6BE	6/2017/0511	Full	under construction	1
Redbridge Farm, Dolmans Hill, Lytchett Matravers BH16 6HP	PDA/2016/0002	Permitted development	not started	1
19 & 20 Huntick Estate, Lytchett Matravers	6/2012/0734	Full	under construction	3
Annaberg, Middle Road, Lytchett Matravers	6/2013/0594	Full	under construction	1

Northhouse Farm, Huntick Road, Lytchett Matravers, BH16 6BB	6/2018/0696	Reserved matters	not started	2
Land at Huntick Road, Lytchett Matravers	6/2018/0063	Full	not started	46
TOTAL				97

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QS702EW - Distance travelled to work	Lytchett Matravers	
Work mainly at or from home	221	15%
Less than 2km	67	5%
2km to less than 5km	117	8%
5km to less than 10km	570	38%
10km to less than 20km	327	22%
20km to less than 30km	86	6%
30km to less than 40km	14	1%
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Appendix 4: Poole Lytchett Matravers Bus timetable

10 Poole - Lytchett Matravers more Bus

Timetable valid from 25/05/2019 until further notice.
 Direction of stops: where shown (eg: W-bound) this is the compass direction towards which the bus is pointing when it stops

Mondays to Fridays											Saturdays							
Service Restrictions	SH	Sch	SH	Sch	SH	Sch	SH	Sch										
Poole, Bus Station (Stand L)	0835	1005	1105	1205	1305	1405	1450	1505	1625	1735	0835	1005	1105	1205	1305	1405	1505	
Sterte, Sterte Post Office (N-bound)	0840	1010	1110	1210	1310	1410	1455	1510	1630	1740	0840	1010	1110	1210	1310	1410	1510	
Stanley Green, opp Palmer Road	0842	1012	1112	1212	1312	1412	1457	1512	1632	1742	0842	1012	1112	1212	1312	1412	1512	
Stanley Green, Wessex Gate (W-bound)	0845	1015	1115	1215	1315	1415	1500	1515	1635	1745	0845	1015	1115	1215	1315	1415	1515	
Upton, Upton Crossroads (N-bound)	0852	1022	1122	1222	1322	1422	1507	1522	1645	1752	0852	1022	1122	1222	1322	1422	1522	
Organford, Organford Manor (W-bound)	0855s	1025s	1125s	1225s	1325s	1425s	1510s	1525s	1648s	1755s	0855s	1025s	1125s	1225s	1325s	1425s	1525s	
Slepe, Newton Farm (N-bound)	0859s	1029s	1129s	1229s	1329s	1429s	1514s	1529s	1652s	1759s	0859s	1029s	1129s	1229s	1329s	1429s	1529s	
Lytchett Matravers, Giebe Road (NE-bound)	0901s	1031s	1131s	1231s	1331s	1431s	1516s	1531s	1654s	1801s	0901s	1031s	1131s	1231s	1331s	1431s	1531s	
Lytchett Matravers, Sports Pavilion (W-bound)	0903s	1033s	1133s	1233s	1333s	1433s	1518s	1533s	1657s	1803s	0903s	1033s	1133s	1233s	1333s	1433s	1533s	
Lytchett Matravers, Meadow Rise (E-bound)	0904s	1034s	1134s	1234s	1334s	1434s	1520	1534s	1658s	1804s	0904s	1034s	1134s	1234s	1334s	1434s	1534s	
Upton, Beacon Hill Caravan Park (SE-bound)	0910	1040	1140	1240	1340	1440	—	1540	1704	1810	0910	1040	1140	1240	1340	1440	1540	

Saturdays	
Poole, Bus Station (Stand L)	1625 1735
Sterte, Sterte Post Office (N-bound)	1630 1740
Stanley Green, opp Palmer Road	1632 1742
Stanley Green, Wessex Gate (W-bound)	1635 1745
Upton, Upton Crossroads (N-bound)	1642 1752
Organford, Organford Manor (W-bound)	1645s 1755s
Slepe, Newton Farm (N-bound)	1649s 1759s
Lytchett Matravers, Giebe Road (NE-bound)	1651s 1801s
Lytchett Matravers, Sports Pavilion (W-bound)	1653s 1803s
Lytchett Matravers, Meadow Rise (E-bound)	1654s 1804s
Upton, Beacon Hill Caravan Park (SE-bound)	1700 1810

Sundays		Bank Holidays	
no service		no service	

Service Restrictions: SH - Dorset School Holidays
 Sch - Dorset School Days
 Notes: s - demand stop

10 Lytchett Matravers - Poole more Bus

Timetable valid from 25/05/2019 until further notice.
 Direction of stops: where shown (eg: W-bound) this is the compass direction towards which the bus is pointing when it stops

Mondays to Fridays											Saturdays							
Service Restrictions	SH	Sch	SH	Sch	SH	Sch	SH	Sch										
Organford, Organford Manor (W-bound)	—	0855	—	1025	1125	1225	1325	1425	1525	1648	1755	0855	1025	1125	1225	1325	1425	
Slepe, Newton Farm (N-bound)	0721	0859	0959	1029	1129	1229	1329	1429	1529	1652	1759	0859	1029	1129	1229	1329	1429	
Lytchett Matravers, Giebe Road (NE-bound)	0723	0901	0901	1031	1131	1231	1331	1431	1531	1654	1801	0901	1031	1131	1231	1331	1431	
Lytchett Matravers, Sports Pavilion (W-bound)	0726	0903	0903	1033	1133	1233	1333	1433	1533	1657	1803	0903	1033	1133	1233	1333	1433	
Upton, Upton Crossroads (E-bound)	0736	0912	0912	1042	1142	1242	1342	1442	1542	1707	1812	0912	1042	1142	1242	1342	1442	
Stanley Green, Wessex Gate (E-bound)	0743	0919	0919	1049	1149	1249	1349	1449	1549	1714	1819	0919	1049	1149	1249	1349	1449	
Stanley Green, Palmer Road (S-bound)	0746	0922	0922	1052	1152	1252	1352	1452	1552	1717	1822	0922	1052	1152	1252	1352	1452	
Sterte, Sterte Garage (S-bound)	0748	0924	0924	1054	1154	1254	1354	1454	1554	1719	1824	0924	1054	1154	1254	1354	1454	
Poole, Bus Station (Stand L)	0755	0930	0930	1100	1200	1300	1400	1500	1600	1725	1830	0930	1100	1200	1300	1400	1500	

Saturdays	
Organford, Organford Manor (W-bound)	1525 1645 1755
Slepe, Newton Farm (N-bound)	1529 1649 1759
Lytchett Matravers, Giebe Road (NE-bound)	1531 1651 1801
Lytchett Matravers, Sports Pavilion (W-bound)	1533 1653 1803
Upton, Upton Crossroads (E-bound)	1542 1702 1812
Stanley Green, Wessex Gate (E-bound)	1549 1709 1819
Stanley Green, Palmer Road (S-bound)	1552 1712 1822
Sterte, Sterte Garage (S-bound)	1554 1714 1824
Poole, Bus Station (Stand L)	1600 1720 1830

Sundays		Bank Holidays	
no service		no service	

Service Restrictions: SH - Dorset School Holidays
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Appendix 5: Table 2 of IHT Guidelines

	Within Town Centres	For Community / Schools	Elsewhere
Desirable	200m	500m	400m
Acceptable	400m	1000m	800m
Preferred Maximum	800m	2000m	1200m

(Consultees 1191476,1191015,1190535)

This statement is made on behalf of the 61 residents of Glebe Road in Lytchett Matravers who strongly oppose this proposed development of 95 houses on Green Belt Land.

Matter A

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Issue 4: Sustainability Appraisal.

Q 1

Q 3

Issue 5: Habitat Regulations

Issue 6: Other Legal and Procedural Requirements

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Issue 4: Sustainability Appraisal

Q1. Has the Plan been subject to an appropriate Sustainability Appraisal (SA) as required by section 19(5) of the 2004 Act having regard to the requirements of the European Directive on strategic environmental assessment and relevant national policy and guidance?

Having looked at the sustainability appraisal of Policy H6 we have to question its veracity. Firstly it scores positively in relation to “Harness the economic potential of tourism and widen employment opportunities” where in fact no employment is proposed and the village has very limited employment opportunities (see our response under Issue 6). Secondly it scores as significantly positive in relation to reducing the need to travel by car and encourage cycling, walking and use of public transport, and as a consequence positively in terms of the final criterion on minimising pollution and the consumption of natural resources. Yet land to the far south of the village (east of Wareham Road) is simply not well served by public transport and the main facilities that are in the village are outside the preferred maximum walking distance (again please see out more detailed response under Issue 6). This also applies to the second criterion. The indirect impacts on the heathlands and Poole Harbour are not acknowledged under the sixth criterion. The assessment does not reflect the differences between the site options within Lytchett Matravers.

A further concern we have is that there is no clear explanation why Option C (was to focus development at just Wool and Redbridge Pit/Moreton Station, with no development at Lytchett Matravers) which scored better in terms of its sustainability scores was rejected and Option A incorporated into Policy V1.

Q3. Has the submitted Plan been tested against all reasonable alternatives where these exist, such as different options for the spatial strategy including the removal of land from the Green Belt and the distribution of development, particularly housing development?

In the light of the local housing market area (which according to SHMA 2015, spans Bournemouth; Christchurch; East Dorset; North Dorset; Poole; and Purbeck) and taking into account the new unitary authority, Dorset Council

(which was established in 1st April 2019 but its formation agreed long before the Purbeck Local Plan was submitted for its examination), the Local Plan has not been tested against all reasonable alternative sites for housing as it has only considered sites within the now defunct Purbeck area.

Different options for housing development, without removing land from Green Belt, need to be explored in this new amalgamation of several other councils in order to satisfy NPPF.

Para 136 states that “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”

Para 137 continues “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.”

The decision to remove land from Green Belt is a serious and irrevocable one and therefore should not be rushed until all other options are given due consideration. This surely must include other sites within the new Dorset Council area.

The former Purbeck District Council may have been keen to avoid delays to the plan, but they have been aware of this change and how it would impact on their plan-making programme since before February 2018 when the Secretary of State’s final decision was announced by way of a written ministerial statement (the draft Order was then laid before Parliament in April 2018).

Furthermore there is no immediate need for housing on this scale in Lytchett Matravers. According to PDC’s evidence, there are at least 97 houses in construction currently or which have been approved and are likely to commence in the next 5 years. Between 2001 and 2014 the Dorset County monitoring showed that the village grew by on average 9 dwellings per annum – so 97 houses is equivalent to 10 year’s supply. The impact of this infilling is already being felt in our village, with increased pressure on our services and roads.

Table of existing housing land supply. See Appendix 1

Graph of completions based on Dorset County Council monitoring data (as previously published). See Appendix 2

Issue 5: Habitat Regulations

Q1. Is the Plan legally compliant with respect to the Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitats Regulations)? The conclusion of the Habitat Regulation Assessment states the need for effective mitigation of the effects of developments.

The indicative location shown for the SANG on the Inset Map is on land to the north-east side of Lytchett Matravers. This is not in an accessible location for the occupants of the proposed 95 houses on the land east of Wareham Road, as it is positioned one and a half miles away from the site; so it is difficult to see how this site would mitigate the effects of this development, particularly given that the nearest heathlands that the SANG is intended to divert pressure from are located to the south (and not to the north).

Issue 6: Other Legal and Procedural Requirements

Q4. Is the Local Plan in compliance with Section 19(1A) of the Planning and Compulsory Purchase Act 2004 which requires development plan documents (taken as a whole) to include policies designed to secure the development and use of land in a local planning authority's area to contribute to the mitigation of, and adaptation to, climate change?

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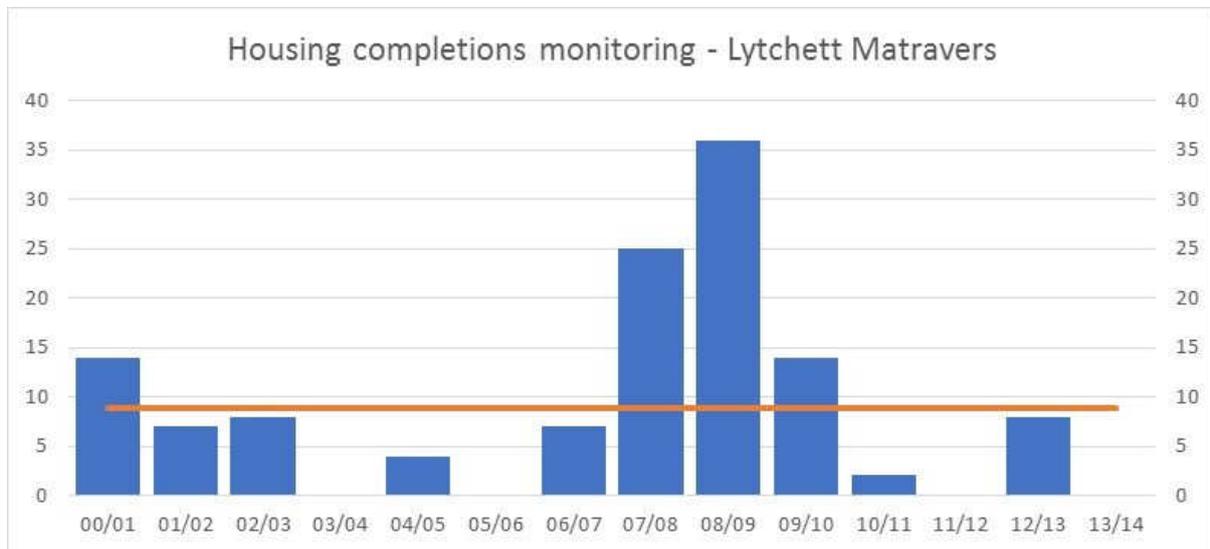
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Mondays to Fridays											Saturdays							
Service Restrictions	SH	Sch	SH	Sch	SH	Sch												
Poole, Bus Station (Stand L)	0835	1005	1105	1205	1305	1405	1450	1505	1625	1735	0835	1005	1105	1205	1305	1405	1505	
Sterte, Sterte Post Office (N-bound)	0840	1010	1110	1210	1310	1410	1455	1510	1630	1740	0840	1010	1110	1210	1310	1410	1510	
Stanley Green, opp Palmer Road	0842	1012	1112	1212	1312	1412	1457	1512	1632	1742	0842	1012	1112	1212	1312	1412	1512	
Stanley Green, Wessex Gate (W-bound)	0845	1015	1115	1215	1315	1415	1500	1515	1635	1745	0845	1015	1115	1215	1315	1415	1515	
Upton, Upton Crossroads (N-bound)	0852	1022	1122	1222	1322	1422	1507	1522	1645	1752	0852	1022	1122	1222	1322	1422	1522	
Organford, Organford Manor (W-bound)	0855s	1025s	1125s	1225s	1325s	1425s	1510s	1525s	1648s	1755s	0855s	1025s	1125s	1225s	1325s	1425s	1525s	
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Lytchett Matravers, Giebe Road (NE-bound)	0901s	1031s	1131s	1231s	1331s	1431s	1516s	1531s	1654s	1801s	0901s	1031s	1131s	1231s	1331s	1431s	1531s	
Lytchett Matravers, Sports Pavilion (W-bound)	0903s	1033s	1133s	1233s	1333s	1433s	1518s	1533s	1657s	1803s	0903s	1033s	1133s	1233s	1333s	1433s	1533s	
Lytchett Matravers, Meadow Rise (E-bound)	0904s	1034s	1134s	1234s	1334s	1434s	1520	1534s	1658s	1804s	0904s	1034s	1134s	1234s	1334s	1434s	1534s	
Upton, Beacon Hill Caravan Park (SE-bound)	0910	1040	1140	1240	1340	1440	—	1540	1704	1810	0910	1040	1140	1240	1340	1440	1540	

Saturdays	
Poole, Bus Station (Stand L)	1625 1735
Sterte, Sterte Post Office (N-bound)	1630 1740
Stanley Green, opp Palmer Road	1632 1742
Stanley Green, Wessex Gate (W-bound)	1635 1745
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Sundays		Bank Holidays	
no service		no service	

Service Restrictions: SH - Dorset School Holidays
 Sch - Dorset School Days
 Notes: s - demand stop

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 Direction of stops: where shown (eg: W-bound) this is the compass direction towards which the bus is pointing when it stops

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Service Restrictions	SH	Sch	SH	Sch	SH	Sch												
Organford, Organford Manor (W-bound)	—	0855	—	1025	1125	1225	1325	1425	1525	1648	1755	0855	1025	1125	1225	1325	1425	
Slepe, Newton Farm (N-bound)	0721	0859	0959	1029	1129	1229	1329	1429	1529	1652	1759	0859	1029	1129	1229	1329	1429	
Lytchett Matravers, Giebe Road (NE-bound)	0723	0901	0901	1031	1131	1231	1331	1431	1531	1654	1801	0901	1031	1131	1231	1331	1431	
Lytchett Matravers, Sports Pavilion (W-bound)	0726	0903	0903	1033	1133	1233	1333	1433	1533	1657	1803	0903	1033	1133	1233	1333	1433	
Upton, Upton Crossroads (E-bound)	0736	0912	0912	1042	1142	1242	1342	1442	1542	1707	1812	0912	1042	1142	1242	1342	1442	
Stanley Green, Wessex Gate (E-bound)	0743	0919	0919	1049	1149	1249	1349	1449	1549	1714	1819	0919	1049	1149	1249	1349	1449	
Stanley Green, Palmer Road (S-bound)	0746	0922	0922	1052	1152	1252	1352	1452	1552	1717	1822	0922	1052	1152	1252	1352	1452	
Sterte, Sterte Garage (S-bound)	0748	0924	0924	1054	1154	1254	1354	1454	1554	1719	1824	0924	1054	1154	1254	1354	1454	
Poole, Bus Station (Stand L)	0755	0930	0930	1100	1200	1300	1400	1500	1600	1725	1830	0930	1100	1200	1300	1400	1500	

Saturdays	
Organford, Organford Manor (W-bound)	1525 1645 1755
Slepe, Newton Farm (N-bound)	1529 1649 1759
Lytchett Matravers, Giebe Road (NE-bound)	1531 1651 1801
Lytchett Matravers, Sports Pavilion (W-bound)	1533 1653 1803
Upton, Upton Crossroads (E-bound)	1542 1702 1812
Stanley Green, Wessex Gate (E-bound)	1549 1709 1819
Stanley Green, Palmer Road (S-bound)	1552 1712 1822
Sterte, Sterte Garage (S-bound)	1554 1714 1824
Poole, Bus Station (Stand L)	1600 1720 1830

Sundays		Bank Holidays	
no service		no service	

Service Restrictions: SH - Dorset School Holidays
 Sch - Dorset School Days

Appendix 5: Table 2 of IHT Guidelines

	Within Town Centres	For Community / Schools	Elsewhere
Desirable	200m	500m	400m
Acceptable	400m	1000m	800m
Preferred Maximum	800m	2000m	1200m

Inspector's Matters, Issues and Questions (MIQs)

Matter A: Legal Compliance and Procedural Requirements

Issue 3: Public Consultation

Question 2

Q2. Were adequate opportunities made available for participants to access and make comments on the Local Plan and other relevant documents?

Library document: [SD06d-New homes for Purbeck consultation report 2018](#)

Answer to Q2

Options consultation 29th January to 12th March 2018

1. With respect to the Options consultation 29th January to 12th March 2018 the answer to the question is no.
2. The Local Plan is not legally compliant because the consultation process was seriously flawed.

Moreton Station

3. A public was conducted across Purbeck District from 29th January to 12th March 2018.
4. All Purbeck Households were sent a questionnaire.
5. On page 16 of the questionnaire was the statement:

Please complete the questionnaire and send it back in the freepost envelope by 12 March 2018.

6. The 12th of March was a Monday.
7. The document states on page 16 that a public consultation event was to be held in Moreton:

Saturday 10 March 10am to 4pm Moreton Village Hall, The Common, Moreton, DT2 8RE
8. The last post leaves Moreton before 10am on a Saturday.
9. Thus the public consultation in Moreton was timed to start after the last post for the questionnaires to reach Public Perspective by 12th March, by First Class post.
10. The Royal Mail advise that Second Class mail can take 2 day and thus if the form was sent by Second Class Post it had to be posted at the latest by Friday 9th March, one day before the consultation.
11. Thus the Moreton residents were unable to take the opportunity of asking questions at the public consultation prior to the last posting dates
12. I complained vigorously to Purbeck District Council that it was totally wrong for a consultation event to be held after the last posting date for the questionnaires.

13. The Public Perspective library document in on page 1 paragraph 6 states:

The 12th March was the 'last posting date'.....

14. This is not what was stated on page 16 of the questionnaire as I have indicated above and as shown on the last page of the library document.
15. I was told that the postmark of questionnaires would be checked to see whether they had been posted on the 12th March.
16. By comparison Swanage, which was not nominated to receive any housing in the Options consultation document had a public consultation event on 10 February almost a month before the closing date for comments.

Legally Compliant?

17. As far as Moreton is concerned, Purbeck District Council may have conducted their public consultation event just within the letter of the law, but it was certainly not within the spirit of the law.

Crossways

18. The Options Consultation document in the Examination library had an allocation to Moreton Station/Redbridge Pit of 440 houses (Option A). 500 houses (Option B) or 600 house (Option C). The impact of whichever option was chosen would fall almost entirely on Crossways.
19. But no public consultation event at which Crossways residents could have asked question was conducted in Crossways.
20. The library document on page 2 at the 5th ● states that 1002 residents participated in the telephone survey. The footnote on page 2 states that *the telephone survey reached a more representative cross section of the population than the consultation questionnaire.*
21. My chart *Right Homes in the Wrong Places* which is in my Spatial Strategy Pre-Submission response, has 2 columns on the left hand side showing the absolute number of calls made to each village or town and the number of calls as a percentage of the total number of houses in the village or town.
22. The chart shows that 18 calls were made to East Stoke (no houses allocated) which contains about 177 houses (a ratio of 10%) no calls were made to Crossways which has about 1100 houses.
23. No houses are allocated to Swanage, but 231 telephone calls were made to residents.
24. I sent an e-mail to Purbeck District Council asking why no phone calls were made to Crossways and received an e-mail reply that this was deliberate as Crossways is in West Dorset and not Purbeck, even though the residents of Crossways were included in the paper consultation.
25. The percentages achieved from the phone survey are quoted throughout the consultation document (library document above).

Legality

26. To allocate the second highest housing total in effect to Crossways and then to not provide the Crossways community with a consultation event at which members of the public could ask question, and to deliberately ignore the Crossways residents in the telephone survey the results of which were given significant weight in the consultation report, would appear to discriminate against the people of Crossways
27. From a lay person's perspective this would appear to break the law on discrimination, and as such was illegal.

Change in the number of houses allocated to Moreton Station

28. The number of houses allocated to Moreton Station in the Options Consultation conducted between 29th January to 12th March was 440 houses (Option A). 500 houses (Option B) or 600 house (Option C), as shown in the library document shown above.
29. The number of houses allocated to Moreton Station in the Pre-Submission document is 490 homes plus a 65 bed care home
30. This is an approximately 14% increase on the number of houses in Option A plus the addition of a 65 bed care home.
31. Wool had an allocation of 470 houses in Option A and this has been kept at 470 houses in the Pre-Submission with the addition of a 65 bed care home.
32. Moreton Station is the only community in Purbeck which has had an increase in its housing allocation.
33. There is no indication in the Options consultation that the Option A housing allocation to Moreton may subsequently be increased to become the largest in Purbeck.
34. There is no indication in the Pre-Submission Purbeck Local Plan why Moreton Station's allocation has been increased by approximately 14% and no indication why a 65 bed care home, not mentioned in the Options document, has been added.

Legality

35. Thus whilst all other communities were clearly consulted in the library document on the housing options for their communities, this was not the case for Moreton Station and Moreton.
36. This would appear to be discriminatory against Moreton Station and Moreton and as such whilst the law on discrimination may or may not cover this type of discrimination it cannot be considered as being within the spirit of the law on discrimination.
37. The lack of a planning reason about why the number of houses allocated to Moreton has been increased and no other community has had its allocation increased clearly fails the transparency test.
38. Again whilst this lack of transparency may be within the law, it is certainly not within the spirit of the law on discrimination.

Inspector's Matters, Issues and Questions (MIQs)

Matter A: Legal Compliance and Procedural Requirements

Issue 4: Sustainability Appraisal

Q 2

Q2. Have the likely environmental, social and economic effects of the Plan been adequately assessed?

Library document: [SD52-Sustainability Appraisal strategic Environmental Assessment report January 2018 consultation](#)

Responses to Pre-Submission Consultation

1. Two responses relevant: Automation and Sustainability Appraisal.

Answer to question 2

2. No.
3. The Sustainability Appraisal and the Draft Local Plan are not sound because they have not been positively prepared and are not justified.
4. The documents are not positively prepared because they do not take account of well publicised technological developments and their impact on society
5. The Sustainability Appraisal and the Draft Local Plan are not justified because they take no account of the impact of technology on almost all aspects of society and therefore on many of the policies in the Plan.
6. The Sustainability Appraisal and Local Plan can only be made sound by taking into account the impact of the technologies described below.

Automation

7. A word search of the Sustainability Appraisal (library document above) revealed that the following words are not in the document: automation, artificial intelligence, artificial general intelligence, robot, driverless vehicles, 5G, cloud computing and computers.
8. Individually and collectively these technologies are very likely to have a profound effect on employment, health provision, retail, banking, transport, delivery services, education, social care, care of the aged and where people choose to live.
9. The Sustainability Appraisal is rooted in the past and present. The Plan if for the future up to 2034.
10. In the period up to 2034 all the technologies referred to above will become ubiquitous and affect everyone's lives, jobs, where they live and the environment.

11. Computers will become cleverer than human beings.
12. Robots will become as dexterous , it not more so, than humans.
13. Robots will utilise 5G communication to call on the superior intelligence embedded the vast computing power of cloud computing around the world.
14. It is also likely that computers will start to gain if they have not already gained consciousness by 2034, and this will be downloaded to robots or robots will exhibit consciousness via 5G connections to cloud computing.
15. 5G computing will also enable the widespread introduction of driverless cars, delivery vehicles and buses.
16. The Purbeck Local Plan Review and the Sustainability Appraisal do not take account of any of the technologies I have discussed above.
17. The Sustainability Appraisal states on page 6:

The five guiding principles for sustainable development are:

- *Living within Environmental Limits*
- *Ensuring a Strong, Healthy and Just Society*
- *Achieving a Sustainable Economy*
- *Promoting Good Governance*
- *Using Sound Science Responsibly*

18. The technologies I have described above will have a profound impact on each of the *five guiding principles*.
19. For example the Draft Local Plan directs the majority of new housing to the west of the district with the largest allocation on the western boundary of Purbeck near but not in Moreton Station settlement.
20. During the plan period it is likely that more and more jobs will become automated and people will need training to be able to work alongside the robots and computers which will dominate many activities. This training will be expensive to establish and will most likely be centred on Poole and Bournemouth.
21. Similarly it is likely that the jobs that will still require human beings to work alongside computers and robots will gravitate to Poole and Bournemouth because of the much larger pool of skilled workers available compared with the rural Dorset County.
22. As a result people will either have to commute the entire length of Purbeck from Moreton Station/Redbridge Pit to Poole or Bournemouth, an approximately 50 mile round trip, or move to live in or be much closer to Poole and Bournemouth.
23. During the Plan Period it will become apparent that putting houses on the very western extreme of the district when most work and skills training will be beyond the eastern boundary of Purbeck in Poole and Bournemouth is a bad idea.
24. It is likely that most of the jobs that are left in Purbeck and West Dorset will be low skilled and poorly paid. This will mean that even fewer people will be able to afford to buy a house in Purbeck.

25. As a result it is likely that there will be an increase in demand for genuinely affordable housing, and an increase in migration and commuting out of the District as people search for skills training and a reasonably paid job within their skill range.
26. None of these issues are discussed in the Draft Local Plan or the Sustainability Appraisal.
27. The UN, the OECD, The Davos Forum and the Bank of England amongst many others have discussed the impact of the new technologies on employment and society and the dangers posed for employment and social cohesion.
28. Chairman Xi of China has made automation technologies his top priority with a goal of being the world leader by 2025.
29. For example facial recognition is now much further advanced in China than in the rest of the world and shoppers can pay for items simply by looking at a camera linked to a computer system which will recognise their face and automatically cause their credit cards or bank accounts to be debited appropriately.
30. Such technology will have a major impact on the retail sector in Purbeck but it is not discussed in the Draft Local Plan or the Sustainability Appraisal.

Crossways

31. The Draft Local Plan places its largest housing allocation, 490 homes plus a 65 bed care home, adjacent to Crossways.
32. The proposed housing allocation is effectively in Crossways from which it is separated merely by Redbridge Road and houses in the proposed development will be closer to the centre and the 2 shops and services in Crossways than are some existing and planned houses in Crossways.
33. But the 172 page Sustainability Appraisal only mentions Crossways 4 times and 3 of those are exactly the same. I have repeated the references below, the page numbers refer to the relevant Sustainability Appraisal pages:

Page 42 The proposals at Wool and Redbridge Pit/Moreton Station promote healthy active lives as they have good footpaths to neighbouring locations for instance Bovington and Crossways where additional facilities or public transport can be found.

*Page 63:
Redbridge Pit/Moreton Station does not benefit from any bus service but is within a walkable distance of Crossways which has buses to Weymouth and Dorchester eight times per day Monday to Friday, and six times per day at weekends.*

Page 72: same as page 63

Page 81: same as page 63

34. The bus service is only used by 2% of Crossways population (DCC statistic) and only 1.9% of the population catch the train to travel to work (2011 Census).
35. West Dorset Council have already approved the building of 500 houses on Summer Farm in Crossways, literally yards away from Moreton Station/Redbridge Pit's 490 houses plus the 65 bed care home.

36. The West Dorset Local Plan Preferred Options (consulted August to October 2018) has proposed an additional 614 houses be built in Crossways. 21 houses have also recently been built in Crossways. About 100 of the 1000 houses to be built on the Silverlake development in Crossways have been completed.
37. Thus excluding Silverlake and the houses that have just been completed, West Dorset Council have approved and plan to build 1114 houses in Crossways.
38. The combined total of West Dorset and Purbeck approved and planned housing for Crossways is 1604 houses.
39. There are about 1100 houses in Crossways and hence the combined West Dorset and Purbeck total of 1604 houses is $1\frac{1}{2}$ times the size of the current Crossways.
40. But the Sustainability Appraisal's only references to Crossways are shown above.
41. There is no sustainability appraisal as to whether the 2 village shops and medical centre will be able to cope with the additional 3273 people (2011 census ratio), whether the water, electricity and sewerage facilities will be able to cope (the utilities have said there is no capacity for the 490 homes), whether the main road through the village, the B3390, will be able to cope with the additional 2265 cars (2011 Census ratio) (a detailed traffic report has been produced but is not discussed), where the economically active population will work (there are studies), where the children will be educated (ideas have been postulated by DCC education department).
42. Nothing.
43. 1604 houses, approximately 3273 people, approximately 2265 cars and a 65 bed care home, and nothing in the sustainability appraisal.

Inspector's Matters, Issues and Questions (MIQs)

Matter A: Legal Compliance and Procedural Requirements

Issue 4: Sustainability Appraisal

Q 3

Q3. Has the submitted Plan been tested against all reasonable alternatives where these exist, such as different options for the spatial strategy including the removal of land from the Green Belt and the distribution of development, particularly housing development?

Library document: [SD52-Sustainability Appraisal strategic Environmental Assessment report January 2018 consultation](#)

Responses to Pre-Submission Consultation

1. Responses: Sustainability Appraisal, SHLAA.

Answer to question

2. No.
3. The Plan is not sound because:
 - a. it has not been positively prepared – it has too narrow a focus and ignores land which could be built upon in the AONB and Green Belt.
 - b. Not justified – the plan does not incorporate the most appropriate strategy and should focus housing on the east of the district

Options

4. The Sustainability Appraisal has only considered the 3 options proposed in the January to March 2018 consultation.
5. Option A was chosen. But without any further consultation, especially with Moreton, the housing allocation for Moreton Station/Redbridge Pit was increased from 440 to 490 houses and a 65 bed care home added.
6. The 3 Options did not include any housing in Swanage and the AONB.
7. The Swanage Local Plan covers the period up to 2027 and proposes the building of 200 houses in Swanage (Swanage Local Plan page 8). Hence although Swanage is in the AONB, the building of houses in Swanage is feasible and acceptable. There is nothing in the Local Plan or Swanage Local Plan which says that Swanage's current 5759 houses spoil the AONB. My SHLAA response shows that land is available for housing in Swanage.

8. West Dorset adjoins Purbeck and shares the same AONB with Purbeck. West Dorset's approved Local Plan (dated 2015) allocates 2705 houses to be built in the AONB, 64% of the total number of houses to be built (4228 houses) in the Local Plan (covered in my SHLAA) response.
9. Other sites in the AONB were indicated as being available in the initial SHLAA and the subjective reasons given to drop these sites are weak. Houses could have been allocated to the AONB.
10. I have also shown in my SHLAA response that land could have been used in the Green Belt but has not been included in the Options.
11. I have shown in my SHLAA that 79% of Purbeck's housing is to the east of the Worgret Bridge close to the western end of Wareham.
12. Thus in effect approximately 80% of Purbeck's population lives east of the Worgret Bridge but 61% of the housing allocations are at least 5/10 miles away to the west of the Worgret bridge.
13. I have shown that land is available in the AONB and Green Belt for housing.
14. The Green Belt is far too large simply to stop urban sprawl from Poole and Bournemouth and the vast majority of the Green Belt serves no purpose other than as a defence by villagers and Wareham inhabitants against development.
15. The simple fact is that Purbeck's largest and most self-contained community with 5759 houses is Swanage (Swanage Local Plan page 19 paragraph 61) and there have never been any complaints that its 5759 houses spoil the AONB. Building hundreds more houses will make little impact on a community the size of Swanage.
16. Of particular note is the fact that the matrix B3 in library document [SD52-Sustainability Appraisal strategic Environmental Assessment report January 2018 consultation](#) on pages 39 and 40 does not give any consideration to the fact that the overwhelming majority of houses allocated in the Options are all 5 to 10 miles from where Purbeck residents currently live and work.
17. According to the Options studied, someone wanting an affordable home who currently lives in Swanage could very likely have to travel over 20 miles west to the affordable homes proposed at Moreton Station/Redbridge Pit.

Summary

18. The 3 Options were far too restrictive and concentrate on putting house at least 5 and 10 miles from where 80% of Purbeck's population lives and works.
19. The 3 Options were thus illogical and land could have been released from the Green Belt and houses could be built on the AONB without any detriment to the AONB.

Inspector's Matters, Issues and Questions (MIQs)

Matter A: Legal Compliance and Procedural Requirements

Issue 6: Other Legal and Procedural Requirements

Q 6 (b)

Q6. (a) Having regard to the provisions of the Local Government (Structural Changes) (Transitional Arrangements) (No.2) Regulations 2008, when is the wider plan for the new unitary authority, within which the area covered by the Purbeck Local Plan falls, intended to be brought forward?

(b) What, if any, are the implications of this for the examination of the Purbeck Local Plan and should the Purbeck Local Plan explain this?

Library document: [SD52-Sustainability Appraisal strategic Environmental Assessment report January 2018 consultation](#)

Responses to Pre-Submission Consultation

1. Responses: Sustainability Appraisal, SHLAA.

Answer to question 6(b)

2. Yes the Purbeck Local Plan should explain the changes which, at the time of drafting, were likely to take place.
3. The Draft Purbeck Local Plan should have provided an explanation of the likely changes which may take place with the creation of Dorset Council and demise of Purbeck Council.
4. Based upon the structure of Wiltshire which has a unitary council it was obvious that the new Dorset Council would create Area Boards to cover planning within designated areas and that in time Dorset Council would produce a strategic plan for the whole of Dorset County.
5. With the removal of tiers of government it was obvious that Dorset Council should draw upon the experience of a neighbouring unitary authority for its planning.
6. To not explain this detail was wrong.

ENVIRONMENT.

Dr A.C.Warne 1190865

Ecologist & Entomologist.

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ENVIRONMENT.

My comments are primarily about the environment but inevitably apply to other sections of the plan. Cross references are indicated.

Matter A Legal Compliance

Issue 4 , Achieving Sustainable Development – an environmental objective.

Question 2 Environmental Test

In my response to the plan I only indicated that I did not feel the plan was sound based on environmental grounds. These are my reasons:

1. The plan has been conceived subjectively by first generating a list of sites that had either been previously rejected or were put forward by past applicants and in the case of Wool the “Vision for Wool” put forward by Savilles/ Weld Estate then using supporting documents that are heavily biased to support the core plan. For example the environmental background paper concludes that there are no fundamental issues with infrastructure. Existing problems of nitrates in the River Frome SSS I and Poole Harbour SPA are either not mention or glossed over, yet these are a major existing problem threatening the value of these sites for wildlife. This lack of fundamental infrastructure issues is contradicted by the SHLAA2016. The Site Selection Background Paper 2016 states that the preferred option was: new infrastructure led approach with a focus on sustainable locations where ever possible, so why was this abandoned?
2. The SHLAA2015 supporting document demonstrates the subjectivity again as its arguments against development of some sites apply equally to the selected sites, for example: being within 400m to 5 km of international important Heathland, contributing to the nitrate problem in Poole etc. The SHLAA15 appears to be the version that was used to select sites. In the later SHLAA2016 it is clearly stated that for the larger sites in Wool there is no sewage works capacity to handle their output. The current sewage works site at Wool is very constrained and it is unlikely that it could be both expanded and include nitrate stripping on the present site. The long term costs of nitrate stripping on top of expanding or rebuilding the existing facility are not mentioned but who would pay? It is very confusing having 2 SHLAA documents that don’t complement but contradict each other.
3. The consideration of local biodiversity is biased towards nationally important sites and species but in the NPPF 19 biodiversity is separate from nationally important sites which implies to me that the biodiversity of the matrix within which the important sites exist is regarded as essential. This is recognised by DEFRA in their report “The 25 year Environment

Plan” that refers to wildlife rich habitat outside the present protected networks and that sites should be “bigger and more joined up”. The mosaic of habitat supporting the biodiversity richness of Wool is a remarkable example of this.

4. The Sustainability Report by Capita is appalling - many words saying nothing and completely dismissive of any negative impacts.

5. The environmental background paper is also subjective when it claims Wool and East Burton are parts of the district with fewest environmental constraints, completely failing to recognise the enhanced wildlife value of organic farmland. Neither Wool Fauna and Flora Group nor I as an individual with a deep knowledge of the biodiversity of the Wool area and beyond were consulted during compilation of this supporting paper despite the extent of our knowledge being conveyed to Purbeck District Council on several occasions. We totally disagree with it and its ambiguous conclusion “that there are no fundamental issues with infrastructure but that significant issues may need to be addressed” (but this is very unspecific). Most of the land proposed in Wool is Organic farmland that should be regarded more highly both as farmland and because a wide range of surveys have demonstrated the organic farmland is on average 30% richer in Biodiversity than conventional farmland and surveys around Wool have confirmed this and indeed found in some areas are more than 30% richer than neighbouring conventionally farmed areas.

Matter F Environment

Question7 Policies E7, E8, E9. E10

There is obviously some confusion in dealing with biodiversity in deciding whether only nationally important species should be considered or whether much wider biodiversity should. Over most of Britain it is only the rare and uncommon species that are sufficiently known about but where evidence is available for the much wider biodiversity of an area it should be taken into account. Purbeck District Council had the important biodiversity of Wool pointed out in meetings, in responses to consultations, the existence of a chapter in a book about Wool and a website about it drawn to their attention but have chosen to ignore it all.

E7.Conservation of Protected Species and Habitats

Protected areas only cover the nesting sites of species not feeding sites. The Habitat and Species Directive Article 4(1) states: sites should correspond to the placeswhich present the physical and biological factors essential to their life and reproduction so there is a case that the woodlands and watermeadows over which Nightjars feed should be included.

The provision of a SANG to take pressure off the Heathland is rather vague for the Wool area. Coombe Wood has been mentioned but not in name in the plan itself (indicated by a star on the proposals map). Ancient woodlands such as Coombe Wood are likely to have a very high biodiversity but when I asked the owner for permission to survey this and other woods to the south of Wool this was denied, so I am unable to make comparisons with other woods in the area but on a size basis this wood is likely to be very good. A narrow strip of ancient woodland on the south of the Bovington Ranges has for example over 500 species of beetles recorded suggesting that at least 750 species could be present in Coombe Wood. Yorkshire Naturalists Trust have published the results of a survey of recreational damage to nature reserves (Bulletin of the Chartered Institute of Ecology and Environmental Management issue 97, 2017) that finds problems are closely related to proximity to settlements. My own experience on a National Nature Reserve within Purbeck district heavily used by the public is that requests to keep dogs on a lead in the nesting season are blatantly ignored. There is no indication of how a SANG would be managed and how it would be paid for but for areas that became open access under the CROW Act it was were assumed would be kept an eye on by the county rangers service ,but this service is now very depleted due to DCC finance cuts. Natural England's response to the plan consultation implies there is another area for the SANG as they say substantial nitrate offsets would be provided suggesting that an area of arable land could be made the SANG.

E8.Dorset Heathlands

This policy to reject new dwellings within 400m of the SPA & SAC boundaries has not been adhered to by Purbeck DC, see my original response to the plan concerning residential caravans on the edge of Winfrith Heath.

E9 Poole Harbour

The Habitats Regulations 2017 require under section 24 that damaging operations should be notified to the appropriate nature conservation body. The existing situation and the adverse changes that these housing proposals may make to Poole Harbour are not thoroughly considered. Purbeck DC have talked about housing development being Nitrate neutral but housing only includes 20% of the nitrates flowing into Poole Harbour. Despite the existing Poole Harbour nitrate plan at least one industrial dairy unit at Newburgh farm (equivalent to a small village) has been recently approved by PDC without any consideration of slurry disposal despite the plan for Poole Harbour saying 80% of nitrates come from agriculture. In addition Ammonia from such intensive farming slurry storages and disposal is also detrimental to wildlife such as Lichens, unpleasant for countryside users and has been the subject of recent debate about its harmful effects on human health. See also the submission by Wendy Riddle to the PDC consultation. Also Matter E Q. 4 & 5 Matter H Q 1.

- Policies are only as good as their application, Purbeck DC has not applied policies to which they are signatories, so what can we expect from the policies in the local Plan?

E10 Biodiversity and Geodiversity.

It has been extremely frustrating that knowledge of the biodiversity of the Wool area gathered by those who know the area extremely well has been ignored and the assessments by consultants from outside the area have been accepted. The Wool area has exceptionally high biodiversity. Studies show that its biodiversity (for by example over 1000 species of beetle have been recorded – 25% the British fauna) is as high as very few other areas in Britain and those are mostly National Nature Reserves or large areas such as The New Forest. This considerable biodiversity underpins the important protected species and a loss of general biodiversity could threaten these. This biodiversity richness is because many biotopes are juxtaposed or there are few barriers between them. About half the species are recorded outside the protected sites and include the same proportion of Rare and Nationally Notable species. Fragmentation of the countryside is recognised as one of the drivers of biodiversity loss. The biodiversity of some of the biotopes is enhanced by being organically farmed.

The universal antidote throughout is that loss of biodiversity can be mitigated for or enhanced but when there is such great diversity as is present in Wool there can only be loss, enhancement or biodiversity net gain is virtually impossible where there is already such high biodiversity (raising water levels on the watermeadows could increase biodiversity in this biotope but would not replace the biodiversity lost to housing and its infrastructure. Mitigation would in any case need to start many years before there is any habitat loss to enable species to transfer, which is not as easy as it sounds. The organic farmland margins are at least 30% richer than comparable conventionally farmed land nearby. It takes many years to qualify for Soil Association Organic status even so this is much shorter than the time needed to mitigate for its biodiversity loss. The hedges between the organic fields are on the face of it fairly recent and a superficial assessment might dismiss them but they and the associated field margins are of great significance for their biodiversity. Matter H Issue 3Q 1

Corridors are much talked about to mitigate for losses but as the proposed new housing would run in an elongate east-west band this would break the continuity between biodiverse habitats on the

north and on the south of Wool. There is already evidence of losses caused by roads forming barriers with the regular deaths of hedgehogs, badgers and deer, these are visible but many less visible species are also casualties including large numbers of bumblebees, important as pollinators.

Conclusions

The plan studiously avoids the mention of a proposal for a National Park despite the remarkable richness of the biodiversity of Purbeck being frequently referred to by Purbeck DC, their consultants and by many who responded to the consultation. Designation of a National Park would be the best start to protect and manage the areas biodiversity.

I do not feel that the Environment policies add up to fulfil the environment criteria test of Sustainable Development and inconsistency and subjectivity make the plan very unsound.

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Submission from Andrew Wilson – Person ID No. 1187806

Examination of the Purbeck Local Plan

Matter A – Legal Compliance and Procedural Requirements

Original Statement:

Consultation January 2018

The Plan talks about the results of the January 2018 consultation and says ‘the most favoured option’ was Option A. Technically this is correct; but when asked what was their preferred option, 35% of respondents chose option A, 28% chose None. And in Wool, whilst 30% chose Option A, 60% said None. That is far from a ringing endorsement for this Plan by any measure. In terms of Wool therefore, the process has been legally and morally questionable because it has repeatedly denied the stated democratic wishes of the community.

This Consultation

Like all the previous consultations, this one is severely flawed and there is evidence to suggest that it too has been designed to prevent large numbers of the community from responding easily and fully. The first consultation, for example, contained the erroneous and deceptive comment that “there was significant support for 1000 houses in Wool”; the second consultation persisted with the apparent impression that there would be between 40% and 50% of all houses built being affordable; all the consultations and attendant publicity have been deliberately vague – and therefore potentially misleading – over infrastructure (for example continuing to state that “a bypass could be considered”); the insistence on an ‘online’ response to this consultation is seen to be discriminatory and disenfranchising.

What follows is an expansion of the points made in the original statement, and it relates to the three questions cited by the Inspector

Issue 3: Public Consultation

Q1. Has consultation on the Plan been carried out in accordance with the Council’s Statement of Community Involvement [SD05] and the requirements of the 2004 Act and the 2012 Regulations?

Q2. Were adequate opportunities made available for participants to access and make comments on the Local Plan and other relevant documents?

Q3. Were representations adequately considered?

My comments and objections relate largely to the specific recommendations and impact on Wool, although of course in all aspects they are also to be extrapolated to the wider view of Purbeck as a whole in the context of this matter.

Whilst I have no doubt that the various consultations that have taken place have been subjected to legal scrutiny and that the requirements as stated in Q1 have probably been carried out, I wish to make a case for suggesting that the whole consultation process – going right back to the 2015 stage – has been so deeply flawed that its outcomes should be discounted. An alternative view, to which I shall return, is that if the consultations **are** felt to be legitimate, then the outcomes have been largely ignored, and the clearly stated democratic wishes of those responded to the

consultations have been over-riden by the greed of the would-be developer in partnership with a craven and ill-advised Purbeck District Council.

It is my contention that right from the start of the process, those who were consulted have been misled, misinformed and mistreated.

In the 2016 consultation for example, it was stated that there is 'relatively strong public support' for 'approximately 1000 homes' in Wool. What was actually true was that in the Partial Review Consultation (2015), we were asked the previous year about our support for 'up to 1,000 homes' in Wool. From the whole of Purbeck, 262 responded on this question (including landowners and councils) of whom only 34% were in favour. If the respondent numbers are broken down further (by postcode), only 1 respondent out of those responding in Wool was actually in favour. So to claim on the basis of these figures that there is 'relatively strong support' for 1,000 new homes in Wool was misleading. You can indeed claim relatively strong opposition to 1,000 new homes since 172 out of 262 (two thirds) were against development of 1,000 homes. And in spite of the Chief Executive of PDC admitting that this could have misled people in responding, the statement was allowed to stand, and undoubtedly influenced people's responses.

The 2016 consultation attempted to disenfranchise because initially it was stated that responses had to be online. It was later admitted that the online portal was not fit for purpose, but by that time, many would-be respondents had already given up. No thought had been given to responses from all household members using one e-mail address – it was admitted that this was also not possible – which is clearly germane to Q2 - *Were adequate opportunities made available for participants to access and make comments on the Local Plan clearly?*

It was not made clear at the start of the process that the 'submit' button had to be pressed after completing each question on-line, and it is therefore highly likely that many responses would have been made invalid as being incomplete. A 'Help' document was only made available halfway through the process.

Another example of the attempt to manipulate the responses from people in Wool also comes from the 2016 consultation in which it was stated – to allay fears of traffic congestion - that (and I now quote) *Dorset County Highways has confirmed that the site could be developed satisfactorily from a transport perspective, including impacts on the Wool level crossing, subject to provision of appropriate mitigation. It is likely that a contribution towards highway infrastructure will be required and this could go towards investigating options for a bypass, or potentially moving the train station further west.*

This was a deliberate attempt to manipulate and deceive, because prior to the publication of this consultation, a statement was made by Dorset County Council as follows: *"Bearing this in mind, and the significant degree of uncertainty for funding and delivery, DCC will seek Cabinet approval to formally abandon this scheme [i.e. the bypass] and develop more deliverable contemporary solutions including the options in conjunction with NR such as relocating the railway station in conjunction with development. Abandonment of the bypass will enable existing developer contributions to be used for other transport provision in Wool."* This decision was made in Cabinet, and the decision was known to PDC – and yet in spite of there

being no possibility of a bypass for Wool, PDC chose to keep the vague possibility of a bypass to be considered in the consultation, which undoubtedly had an influence on respondents.

In a final comment on the 2016 consultation, PDC deliberately – or so it would seem – chose to use language that was designed to manipulate. At no time would any member or officer define the word ‘partial’ that was used (as in the question regarding giving ‘partial agreement’ to a proposal to build ‘up to’ a certain number of houses). Secondly, by stating that the consultation was based on the ‘preferred options’ it was never made clear who preferred these options, which led to many respondents feeling that there was no point in responding as preferences apparently already existed. It was admitted – again by the Chief Executive – that the term ‘preferred option’ could be misleading, but it was not withdrawn.

Thus, in many ways, the flawed nature of the 2016 consultation merely made the 2018 consultation all the more questionable. At no time did PDC actually admit that the figures that had been quoted according to the SHMAA findings of G L Hearn (on which the 2016 proposals were based) had actually been wrong. Neither was it ever publicly acknowledged that the SHMAA had not been objectively assessed and that the only ‘local knowledge’ component had been compiled by the LEP (which had a considerable vested interest). At no time has PDC ever admitted that there was no evidence base for the claim that the houses were needed for the 3,000 new jobs which were being predicted – a number which PDC has now retracted. It is perhaps also worth pointing out that the Chairman and no fewer than six members of the Review Advisory group also sat at that time on the Planning Committee – surely a possible conflict of interests, and no more or less than the fact that DCC/PDC are landowners and investors in the LEP, and the then-Chairman of the LEP was also the main landowner and would-be developer for housing in Wool.

A final comment on the **legitimacy** (not the legality as such) of the 2016 consultation would be to refer to two statements made by PDC: the first was that PDC ‘would not be bound by the wishes expressed by respondents’ – in which case why bother to consult, and this certainly impacted on many would-be respondents who decided not to bother. The second statement was made by at least two of the elected members – that anyone who did not respond would be deemed to be in support of the proposals, suggesting that whatever the outcome of the responses, PDC had already made its mind up.

And so turning to the 2018 Consultation, and whilst repeating that I have no doubt that the various consultations that have taken place have been subjected to legal scrutiny (albeit by PDC’s own legal department) and that the requirements as stated in Q1 have probably been carried out, there is a large moral question to be answered which calls into doubt the whole legitimacy of the process.

On page two of the advisory notes that accompanied the *pro forma*, a series of statements was made as to why these houses were needed. I would contend that from the very outset of this consultation, PDC attempted to deceive and manipulate responses. Put simply, the proposal will not in fact deliver any of these objectives. As an example of how respondents were ‘taken in’ by these statements, later in the document, referring to affordability, it states that PDC’s policy is that between 40% and 50% of houses on developments are affordable. It has subsequently been

admitted that this was merely a statement of aspiration and policy, and was not in any way enforceable, and that even if affordable houses were to be built, they would be affordable only by the government definition thereof (i.e. 80% of market value) – and a district councillor admitted in a public forum that such houses would simply not be genuinely affordable – but again, the damage was done, with many local people saying that we needed houses as that meant we would get lots of council houses. It has even been stated publicly that as far as Wool is concerned, any affordable requirement will be off-sited to Lulworth. And yet the documents did not make any of the reality of affordability and social housing clear to respondents.

In a further attempt to get the answer that they had wanted all along, in the 2018 consultation, PDC ensured that respondents were denied the possibility of choosing to reject all the options (although many did so). None of the questions allowed respondents to choose a more appropriate number for their area, which – in my opinion - suggests that previous representations were not adequately considered because responses were not genuinely representative of genuine opinions.

All the consultations and attendant publicity have been deliberately vague – and therefore potentially misleading – over infrastructure (for example continuing to state that “a bypass could be considered”) and so like all the previous consultations, the 2018 version was severely flawed and there is evidence to suggest that it too had been designed to prevent large numbers of the community from responding easily and fully. Initially only one response *pro forma* was sent out to each household – and it was not fully explained initially that multiple responses were allowed from multiple-occupancy households, although the process of obtaining extra documentation was not made easy. Again, this is a good example of the way PDC attempted to manipulate the outcome by restricting responses.

Jumping to the outcomes of the January 2018 Consultation, again there is plenty of evidence of flawed and skewed interpretation.

The Plan talks about the results of the consultation and says ‘the most favoured option’ was Option A. Technically this is correct; but when asked what was their preferred option, whilst 35% of respondents chose option A, 28% chose None. And in Wool, whilst 30% chose Option A, 60% said None. That is far from a ringing endorsement for this Plan by any measure. In terms of Wool therefore, the process has been legally and morally questionable because it has repeatedly denied the stated democratic wishes of the community.

And even the Pre-Submission ‘consultation’ was flawed. By initially restricting responses to being on-line, large swathes of the Wool demographic were effectively disenfranchised. It was only after strong protests that it was acknowledged that some people might find responding difficult, and whilst facilities to give IT support were indeed extended, there is ample anecdotal evidence that at every stage of the consultation process (2016, 2018 and the Pre-Sub process) there has been a feeling of detachment and alienation and disenfranchisement.

A further example of the way PDC has attempted to subvert and manipulate the process can be found by the inclusion of a proposal for a 65 bed nursing home to be built in Wool. This is a completely spurious proposal: at no time was there ever any

mention in previous consultations of this idea; the only comparable new build nursing home in the area is at Sandford, and it is running at less than half capacity – indicating either lack of demand or lack of affordability. The contempt with which PDC has treated this community is underlined by the fact that the local surgery was not consulted on this proposal, nor was the CCG and nor was NHS Dorset. It also begs the question as to why a nearby nursing home to Wool (in Winfrith) was closed down if there was any actual need for one in Wool.

This is yet another example of the way that additions and revisions to the proposals or consultation documents have been made in mid-consultation or mid-process. Early respondents might well have responded differently had these additions and revisions been in place earlier, for example the proposal to commute social housing from Wool to Lulworth.

Another – and perhaps more sinister example – was a subtle change in wording between the document that was circulated to households and the questions that were put to students at The Purbeck School during the 2016 consultation. This is significant because the responses of the students were included in the results – but close reading of the ‘adult’ version states that “infrastructure could be provided” whilst the student version states that “infrastructure would be provided”. Inevitably, this produced a skewed response in the case of the student survey, which was markedly different from the adult response, and yet carried as much ‘weight’.

Additionally, It would appear that the initial premise and promise voiced by PDC members at a public meeting that respondents had to be on the electoral role was ignored – and it is clear that tourists, non-residents and visitors to the area were allowed to respond to the 2018 consultation, and that their responses were included even though they were clearly not ‘stake-holders’.

Turning finally to Question 3 - Were representations adequately considered? – the unequivocal answer for Wool, and indeed for the rest of Purbeck is a resounding “No”.

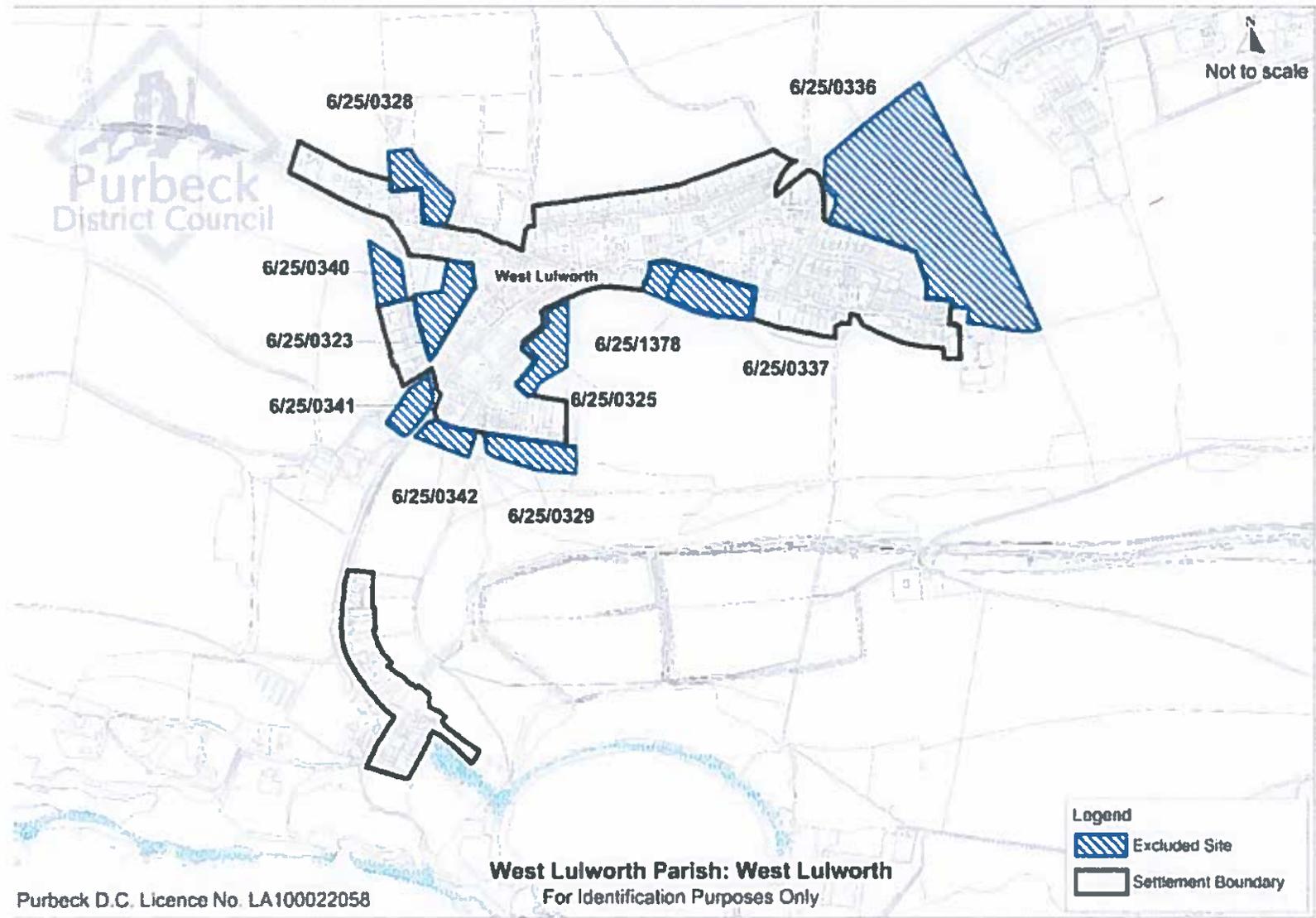
Given the strength of feeling in the responses to each consultation – that only a very small minority actually opted for any houses at all in Wool for example (when given the chance to do so, a chance which was effectively denied in the 2018 consultation) – it is clear that PDC has consistently ignored the mandate given them by the electorate. At no time were members of the public allowed to engage in open, public debate with members (or officers) of PDC, and thus the whole process was deliberately controlled by PDC. Whilst members of the public could, and did, utilise their entitlement to Public Participation statements at PDC meeting, there was never an opportunity to question PDC members and officers in open formal debate.

There is a possible counter-view to be voiced: as mentioned earlier in this document and analysis, if the consultations *are* felt to be legitimate, then the outcomes have been largely ignored, and the clearly stated democratic wishes of those responded to the consultations have been over-ridden by the greed of the would-be developer in partnership with a craven and ill-advised Purbeck District Council.

The numbers speak for themselves. At every stage of the various consultations there has been a clear and unequivocal rejection of the proposals for Wool, and yet in spite of this, PDC has continued to argue that ‘government policy’ must be obeyed, and this

has led to manipulating the outcome of the various successive consultations in an attempt to get a favourable response. It was clear from every meeting that PDC had no intention of following the various mandates that they were given, and whilst there might have been legal compliance, the moral legitimacy of the consultations, and certainly the outcomes and proposals derived from them, is deeply questionable. These very flawed procedures have been used to justify proposals to build houses that Wool neither wants nor needs. It is not within the remit of this particular Matter for Examination to comment on that specifically – but it is relevant to mention it, because the proposals are based on a flawed process which has ignored the democratic rights and wishes of the community.

Andrew Wilson
02/07/2019



Purbeck D.C. Licence No. LA100022058

SHLAA ref	Reason for exclusion
6/23/1343	It is within the green belt and the Council's green belt review concluded that development here would extend Wareham in an easterly direction towards the conurbation. This would have a harmful sprawling effect and would be an incursion into the countryside, contrary to the purposes of the green belt. Around half of the site to the south and east is within the flood zone.
6/23/1348	Flood zones 2 & 3 cover site. Site adjoins SSSI.
Wareham St Martin	
6/24/0293	Majority of site within 400m buffer; not confirmed as available; unrelated to the settlement boundary.
6/24/0347	Majority of site in 400m buffer.
6/24/0544	Unrelated to settlement boundary and not confirmed as available.
6/24/0550	Unrelated to settlement boundary.
6/24/1313	Whole site in 400m buffer.
West Lulworth	
6/25/0323	Not confirmed as available.
6/25/0325	There would likely be a significant landscape impact, given the very steep upward slope of the site. Development here would be too harmful in landscape terms.
6/25/0328	Historic England says there is potential for this site to impact on a conservation area and listed buildings. The Council's conservation area appraisal notes the value of the open space here. Development has been dismissed at appeal twice here on grounds of the importance of the gap and views.
6/25/0329	The Council's conservation area appraisal states that this is notable green space and an attractive character. The value of the open space in terms of character of the conservation area is such that it would be inappropriate to development this site. Furthermore, it is questionable whether it would be possible to relocate the allotments into an area that would have a modest landscape impact. Planning permission for residential development has been refused twice previously.
6/25/0336	There would likely be a significant landscape impact and harm to the AONB, given the exposed nature of the site and that it would sprawl the village towards the east and risk a merging effect with the MOD properties in this direction.
6/25/0337	There would likely be a significant landscape impact, given the very steep upward slope of the site. Development here would be too harmful in landscape and conservation terms.
6/25/0340	This is quite an exposed site, which slopes steeply upwards towards the north and west in this AONB location on the edge of the conservation area. Initial comments from the Dorset AONB Team raise significant concerns, for example the likely required engineering works; and effect of extending this part of the village towards the church.

SHLAA ref	Reason for exclusion
6/25/0341	The site is within the AONB and conservation area. Initial comments from the Dorset AONB Team raise objections to the development of this site on grounds of its sensitivity, located at a junction between the village and the road leading down to Lulworth Cove.
6/25/0342	There is an upward slope to the south east, making it an exposed site in the AONB and conservation area. Initial comments from the Dorset AONB Team raise objections to the development of this site on grounds of its sensitivity, located at a junction between the village and the road leading down to Lulworth Cove.
6/25/1378	Not likely that the adverse impacts on: i) the character and appearance of the West Lulworth Conservation Area; ii) the setting of neighbouring listed buildings; or iii) the loss of existing facilities (in the form of an existing car parking area); can be avoided, mitigated or compensated. These constraints severely restrict the potential to deliver new homes at the site.
Winfrith Newburgh	
6/26/0297	Majority of site in flood zones 2 & 3 and unrelated to the settlement boundary
6/26/0298	The area of flood risk rules out a large area of this site. This means development would only abut the road and properties to the west of the village. This would make for an illogical and awkward extension to the village and could be harmful in townscape terms.
6/26/0299	Majority of site in flood zones 2 & 3
6/26/0300	Not confirmed as available.
6/26/0301	Unrelated to settlement boundary.
6/26/0302	Majority of site in flood zones 2 & 3; not confirmed as available; and unrelated to the settlement boundary
6/26/0303	The site is designated an enterprise zone and employment should form the focus. Majority of site in 400m buffer. SAC, Ramsar & SSSI within site boundary. Not related to settlement boundary.
6/26/0307	Development would need to be low density in order to reflect local character and this would mean a development of 3-4 dwellings. This would then be too small for the Council to include in the SHLAA, according to Planning Practice Guidance.
6/26/0308	Unrelated to settlement boundary.
6/26/0309	2/3 of site in 400m buffer (northern part). Northern half of site in flood zones 2 & 3. Not confirmed as available. Unrelated to settlement boundary.
6/26/0435	The landowner has tested 120 homes on the playing fields site, but Natural England does not believe the SANG would be effective. Sport England would object as the replacement playing fields would not be of equal or better quality and would be around 1/3 of the original size.
6/26/1344	Unrelated to settlement boundary.
6/26/1345	Unrelated to settlement boundary.